



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE BEGINNING OF MUR # 3054

DATE FILMED 3-87-92 CAMERA NO. 3

CAMERAMAN T.M.H.

2-304894708

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: 2 March 1990

ANALYST: LINDA TANGNEY

I. COMMITTEE: Ros-Lehtinen for Congress Committee
(C00236976)
Richard Preston Tonkinson, Treasurer
(June 19, 1989 to December 31, 1989)^{1/}
8241B NW 56th Street^{2/}
Miami, FL 33166

II. RELEVANT STATUTE: A. 2 U.S.C. §441a(f)
B. 2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

III. BACKGROUND:

A. Acceptance of Apparent Excessive Contributions
2 U.S.C. §441a(f)

The Ros-Lehtinen for Congress Committee ("the Committee") has accepted apparent excessive contributions totalling \$16,800 from four (4) individuals and three (3) qualified multicandidate political party committees in 1989.

Schedule A of the Committee's 1989 30 Day Special Post-General Report discloses a total of \$2,800 in apparent excessive contributions from four (4) individuals, and a \$4,500 apparent excessive contribution from a qualified multicandidate political party committee. Schedule A of the 1989 Termination Report for the Special Congressional

^{1/} On January 27, 1990, the treasurer, Richard Preston Tonkinson filed a letter which states that he is no longer the treasurer as of "December 31, 1989." The Committee has not appointed a new treasurer; however, the candidate, Ileana Ros-Lehtinen signed the 1989 Year End Report.

^{2/} The address for the Committee prior to February 1, 1990 was 401 Miracle Mile, Coral Gables, Florida 33134.

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REPORTS ANALYSIS OGC REFERRAL
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Election Fund ("the Fund"), an authorized committee for Ileana Ros-Lehtinen, discloses a total of \$9,500 in apparent excessive contributions from two (2) qualified multicandidate political party committees. The \$9,500 in apparent excessive contributions resulted when the contributions disclosed on the Fund's Termination Report were aggregated with the contributions disclosed on the Committee's reports. The amount of apparent excessive contributions totals \$16,800. All of the apparent excessive contributions were designated for the general election (Attachments 2 through 13 and Chart A).

On December 7, 1989, a Request for Additional Information ("RFAI") was sent to the Committee. The RFAI states that an individual or political committee other than a qualified multi-candidate committee may not contribute to a candidate for federal office in excess of \$1,000 per election. The RFAI also states that a qualified multi-candidate committee may not contribute to a candidate for federal office in excess of \$5,000 per election. The RFAI states that any refunds, redesignations, or reattributions of excessive contributions should be made within sixty (60) days of the treasurer's receipt of the contributions. The RFAI concludes that although the Commission may take further legal steps, prompt action by the Committee to refund, redesignate or reattribute the apparent excessive amounts will be taken into consideration (Attachment 15). When no written response was received, a second letter was sent to the Committee on December 28, 1989 (Attachment 16).

On January 23, 1990, the treasurer, Richard Tonkinson, telephoned a Reports Analysis Division ("RAD") analyst. Mr. Tonkinson stated that although he had resigned as the Committee's treasurer, he wished to respond to the letters from the Commission regarding the reports he had filed for the Committee. The analyst stated that Mr. Tonkinson should review the letters (RFAIs) and the Committee's reports so that he could take appropriate action with regard to the excessive contributions (Attachment 17).

On January 31, 1990, a written response was received from the Committee. The response referred to the apparent excessive contributions from the individuals and political party committees, and noted that letters had been sent to these contributors. The response includes letters to each of the four (4) individuals requesting the reattribution of the apparent excessive contributions. The response also includes letters to each of the three (3) qualified multicandidate political party committees which requested the redesignation of the apparent excessive contributions (Attachment 18).

To date, no further response has been received.

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B. Failure to File 48 Hour Notifications
2 U.S.C. §434(a)(6)
11 CFR §104.5(f)

The Committee may have failed to file twenty-five (25) 48 hour notifications totalling \$29,000 prior to the 1989 Special General Election.

The candidate was involved in the Special General Election held on August 29, 1989. Prior notice was sent to the Committee on June 26, 1989. This notice includes a section titled "Last Minute Contributions." This section states "Committees which receive a contribution of \$1,000 or more, between 20 and 2 days before the election, must report it within 48 hours of its receipt" (Attachment 19). The Committee was required to file 48 hour notifications for contributions of \$1,000 or more received from August 10, 1989 through August 26, 1989. Contributions received prior to the 1989 Special General Election and disclosed on Schedule A of the 1989 30 Day Special Post-General Report indicate that the Committee may have failed to file twenty-five (25) 48 hour notifications for contributions totalling \$29,000 (Attachments 20 through 37 and Chart B).

On November 7, 1989, an RFAI for the 1989 30 Day Special Post-General Report was sent to the Committee. The RFAI stated on an informational basis that the Committee may have failed to file one or more of the 48 hour notifications required for "last minute contributions" of \$1,000 or more. The RFAI stated that although the Commission may take further legal steps, any response the Committee may wish to make would be taken into consideration (Attachment 38).

On December 7, 1989, Mr. Tonkinson telephoned the analyst to ask about the missing 48 hour notifications. The analyst stated that the majority of missing 48 hour notifications appeared to be for contributions received on August 25, 1989. Mr. Tonkinson stated that he would look into it (Attachment 39).

On December 11, 1989, a written response was received from Richard Tonkinson. The written response from the treasurer stated "I am aware of the 48 hour notice regarding last minute contributions, and understand that the 48 hour report was not made for August 25, 26, 27, and 28, 1989. This was due to the severe intensity of the campaign in the final days whereby collection of contributions and paying of vendors bills were the major priorities. The demands on the volunteers time in the finance area were such that the reports were not generated for the days mentioned. I apologize for this matter and the reelection campaign

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treasurer will do their best to adhere to this regulation. Ileana is considering using the services of a full time CPA firm for her reelection campaign in order to correct this situation" (Attachment 40).

IV. OTHER PENDING MATTERS INITIATED BY RAD:

None.

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ROS-LEHTINEN FOR CONGRESS COMMITTEE
 APPARENT EXCESSIVE CONTRIBUTIONS
 CHART A

Contributor's Name and Excessive Amount	Date	Amount and Election Designation	1989 Special Election Reports	Attachment
Frederick W. Guardabassi <u>\$500</u>	7/08/89	\$ 500 (P)	12 Day Pre-Primary	2
	8/04/89	500 (G)	12 Day Pre-General	3
	8/10/89	500 (G)	30 Day Post-General	4
	8/25/89	500 (G)	30 Day Post-General	5
Robin Kaskal <u>\$1,000</u>	8/29/89	\$1,000 (G)	30 Day Post-General	6
	8/30/89	1,000 (G)	30 Day Post-General	7
Alma E. Morissette <u>\$1,000</u>	8/14/89	\$1,000 (G)	30 Day Post-General	8
	8/25/89	1,000 (G)	30 Day Post-General	9
Fernando Rodriguez <u>\$300</u>	8/18/89	\$1,000 (G)	30 Day Post-General	10
	8/25/89	300 (G)	30 Day Post-General	11
Republican Party of Florida <u>\$4,500</u>	8/09/89	\$4,500 (G)	12 Day Pre-General	12
	8/11/89	5,000 (G)	30 Day Post-General	14
National Republican Congressional Committee <u>\$4,500</u>	8/07/89	\$4,500 (G)	12 Day Pre-General	12
	*8/08/89	5,000 (G)	Termination	13
Republican National Committee <u>\$5,000</u>	8/07/89	\$5,000 (G)	12 Day Pre-General	12
	*8/08/89	5,000 (G)	Termination	13

TOTAL AMOUNT OF APPARENT EXCESSIVE CONTRIBUTIONS: \$16,800

(P) = Primary Election
 (G) = General Election

*These contributions were disclosed on Schedule A of the Special Congressional Election Fund's Termination Report. (All other contributions listed above are contributions disclosed on Schedule A of the Ros-Lehtinen for Congress committee's reports.)

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ROS-LEHTINEN FOR CONGRESS COMMITTEE
 CONTRIBUTIONS DISCLOSED ON SCHEDULE A OF THE
 1989 SPECIAL POST-GENERAL ELECTION REPORT
 FOR WHICH NO 48 HOUR NOTICES WERE FILED
CHART B

Name of Contributor (as reported by Committee)	Amount
William D. Griffin	\$ 1,000
Miguel B. Fernandez	1,000
Frank A. Shepard	1,000
William McB. Wood	1,000
Elsa Eaton	1,000
Van L. McNeel	1,000
Manuel Smilowitz	1,000
Luis Ajanil	1,000
Norman Braman	1,000
Ed Cortlett III	1,000
Enrique Diaz	1,000
John L. Eakins	1,000
Eddy Frances	1,000
Josephine Kouri	1,000
Robert L. Lipton	1,000
John Lowell Jr.	1,000
Natashia Lowell	1,000
John D. Montgomery	1,000
Alma E. Morissette	1,000
Vander Jagt Campaign Committee	1,000
Charles F. Wolfe	1,000
Business-Industry PAC	1,000
LUPAC	5,000
Holland and Knight PAC	1,000
Credit Union Legislative PAC	<u>1,000</u>
TOTAL	\$29,000

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FEDERAL ELECTION COMMISSION
1989-1990
CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

DATE 13FEB90

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
	OFFICE BOUGHT/	PARTY	PRIMARY	GENERAL			
ROS-LEHTINEN, ILEANA		HOUSE 18 REPUBLICAN PARTY			FLORIDA	1990 ELECTION	ID# H0FL18025
1. STATEMENT OF CANDIDATE							
1989 STATEMENT OF CANDIDATE						19JUN89	1 89HSE/379/2258
STATEMENT OF CANDIDATE - AMENDMENT						25AUG89	1 89HSE/384/2612
STATEMENT OF CANDIDATE						16NOV89	1 89HSE/386/0170
2. PRINCIPAL CAMPAIGN COMMITTEE							
ILEANA ROS-LEHTINEN FOR CONGRESS - 1990						ID #C02239731	HOUSE
1989 STATEMENT OF ORGANIZATION						24OCT89	1 89HSE/385/4060
YEAR-END			59,316		13,911	30SEP89 - 31DEC89	27 90HSE/389/1862
TOTAL			59,316	0	13,911	0	28 TOTAL PAGES
3. AUTHORIZED COMMITTEES							
ILEANA ROS-LEHTINEN FOR CONGRESS						ID #C02238976	HOUSE
1989 STATEMENT OF ORGANIZATION						19JUN89	1 89HSE/379/2257
48 HOUR CONTRIBUTION NOTICE						25JUL89	3 89HSE/380/3060
48 HOUR CONTRIBUTION NOTICE						26JUL89	2 89HSE/380/4011
48 HOUR CONTRIBUTION NOTICE						31JUL89	3 89HSE/381/3619
48 HOUR CONTRIBUTION NOTICE						18AUG89	2 89HSE/382/1945
48 HOUR CONTRIBUTION NOTICE						19AUG89	2 89HSE/382/0603
48 HOUR CONTRIBUTION NOTICE						40AUG89	2 89HSE/383/4027
48 HOUR CONTRIBUTION NOTICE						14AUG89	3 89HSE/384/0987
48 HOUR CONTRIBUTION NOTICE						15AUG89	3 89HSE/384/1127
48 HOUR CONTRIBUTION NOTICE						21AUG89	3 89HSE/384/2190
48 HOUR CONTRIBUTION NOTICE						23AUG89	2 89HSE/384/2416
48 HOUR CONTRIBUTION NOTICE						23AUG89	2 89HSE/384/2623
STATEMENT OF ORGANIZATION - AMENDMENT						25AUG89	1 89HSE/384/2611
48 HOUR CONTRIBUTION NOTICE						25AUG89	2 89HSE/384/2515
48 HOUR CONTRIBUTION NOTICE						25AUG89	3 89HSE/384/2625
PRE-SPECIAL			201,813		133,173	6JUN89 - 14JUL89	102 89HSE/382/0956
PRE-SPECIAL - AMENDMENT						6JUN89 - 14JUL89	10 89HSE/382/3025
PRE-SPECIAL - AMENDMENT						6JUN89 - 14JUL89	1 89HSE/382/0252
REQUEST FOR ADDITIONAL INFORMATION						6JUN89 - 14JUL89	5 89HSE/387/1046
REQUEST FOR ADDITIONAL INFORMATION						6JUN89 - 14JUL89	5 89HSE/387/1051
REQUEST FOR ADDITIONAL INFORMATION AND						1JUN89 - 14JUL89	5 89HSE/389/0214
REQUEST FOR ADDITIONAL INFORMATION AND						6JUN89 - 14JUL89	6 89HSE/389/0219
REQUEST FOR ADDITIONAL INFORMATION						15JUL89 - 26JUL89	2 89HSE/389/1665
REQUEST FOR ADDITIONAL INFORMATION						15JUL89 - 26JUL89	2 89HSE/389/1667
REQUEST FOR ADDITIONAL INFORMATION AND						15JUL89 - 26JUL89	5 89HSE/389/0983
REQUEST FOR ADDITIONAL INFORMATION AND						15JUL89 - 26JUL89	5 89HSE/389/0988
PRE-RUN-OFF			169,843		170,358	15JUL89 - 26JUL89	137 89HSE/383/4371
PRE-RUN-OFF - AMENDMENT			170,357		170,358	15JUL89 - 26JUL89	16 89HSE/384/0461
PRE-RUN-OFF - AMENDMENT						15JUL89 - 26JUL89	1 89HSE/384/0254
1 ST LETTER INFORMATIONAL NOTICE						15JUL89 - 26JUL89	4 89HSE/384/3339
PRE-SPECIAL			126,571		140,502	27JUL89 - 15AUG89	01 89HSE/384/1208

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FEDERAL ELECTION COMMISSION
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CANDIDATE INDEX OF SUPPORTING DOCUMENTS - (E)

PAGE 2

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/ PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
PRE-SPECIAL	- AMENDMENT		-			-27JUL89 - 9AUG89	1	89HSE/386/0017
PRE-SPECIAL	- AMENDMENT		128,971		140,902	27JUL89 - 9AUG89	14	90HSE/389/3353
REQUEST FOR ADDITIONAL INFORMATION						27JUL89 - 9AUG89	2	89FEC/609/1670
REQUEST FOR ADDITIONAL INFORMATION 2ND						27JUL89 - 9AUG89	5	89FEC/611/0978
POST-SPECIAL			500,477		540,645	10AUG89 - 18SEP89	284	89HSE/385/1885
POST-SPECIAL	- AMENDMENT		-			-10AUG89 - 18SEP89	1	89HSE/386/0018
POST-SPECIAL	- AMENDMENT		-			-10AUG89 - 18SEP89	2	89HSE/386/1159
POST-SPECIAL	- AMENDMENT		539,477		574,645	10AUG89 - 18SEP89	14	90HSE/389/3367
REQUEST FOR ADDITIONAL INFORMATION						10AUG89 - 18SEP89	2	89FEC/614/2843
REQUEST FOR ADDITIONAL INFORMATION						10AUG89 - 18SEP89	15	89FEC/616/3188
REQUEST FOR ADDITIONAL INFORMATION 2ND						10AUG89 - 18SEP89	16	89FEC/618/2017
REQUEST FOR ADDITIONAL INFORMATION						10AUG89 - 18SEP89	2	90FEC/618/2144
REQUEST FOR ADDITIONAL INFORMATION 2ND						10AUG89 - 18SEP89	1	90FEC/618/3599
REQUEST FOR ADDITIONAL INFORMATION 2ND						10AUG89 - 18SEP89	3	90FEC/620/0944
YEAR-END			13,020		31,472	19SEP89 - 31DEC89	9	90HSE/389/3326
							737	TOTAL PAGES
SPECIAL CONGRESSIONAL ELECTION FUND:THE						ID #00237503	HOUSE	
REQUEST FOR ADDITIONAL INFORMATION						0 00	1	89FEC/606/4080
1989 STATEMENT OF ORGANIZATION						14JUL89	2	89HSE/379/4461
STATEMENT OF ORGANIZATION - AMENDMENT						25AUG89	1	89HSE/384/2613
TERMINATION REPORT						22,600 14JUL89 - 18NOV89	8	89HSE/386/2009
							12	TOTAL PAGES
							849	AUTH TOT PAGES

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4. JOINT FUNDRAISING COMMITTEES AUTHORIZED BY THE CAMPAIGN

All reports have been reviewed except the 1989 Year-End Report.

Ending Cash-On-Hand as of 12/31/89: \$1086

Outstanding Debts as of 12/31/89: \$0

TABLE A

Information shown here with respect to employment is for the purpose of identifying contributions or to determine if an employer is using the services of any individual who is a contributor to the campaign of any candidate for Congress.

ALL OF CONTRIBUTION IS FOR

Eleana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date Incentive (M, Y, YR)	Amount of Cash Received (M, Y, YR)
Frederick W. Guarnation 915 Middle River Dr Fort Lauderdale FL 33404 Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Self Investor Aggregate Value > \$1 500.00	8 4 89	500.00
[Blank]	[Blank]	[Blank]	[Blank]
Al Stein PO Box 10151 Pompano Beach FL 33061 Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Retired Aggregate Value > \$1 250.00	8 4 89	250.00
Alicia Pilar Barreiro 101 SW 65 Ave Miami FL 33144 Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Clinic Aggregate Value > \$1 500.00	8 4 89	500.00
Bruno Barreiro, Jr. 101 SW 65 Ave Miami FL 33144 Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Clinic V.P. Aggregate Value > \$1 500.00	8 4 89	500.00
Patrick Hucker 3030 W. 111 Ave Coral Gables FL 33065 Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Youcad Homes Contractor Aggregate Value > \$1 1000.00	[Blank]	1000.00
Amikam Turel 1020 S Canal Dr Homestead FL 33085 Reason For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify)	Village of Homestead CEO Aggregate Value > \$1 1000.00	[Blank]	1000.00

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TOTAL of Receipts This Page (Include) 3750.00

TOTAL This Period (All pages and the number only)

SCHEDULE A

FINANCED RECEIPTS

This report is submitted for each category of the Qualified Summary Page

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 11 A 1

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to which contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

9 2 2 0 1 4 3 0 8 5 9 4 7 3 9

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Vivian S. Tarace 8801 Brickell Avenue Apt. 1103 Miami, Florida, 33129		8-10-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
B. Full Name, Mailing Address and ZIP Code Mr. Stanley Tale 1175 NE 125 Street Suite 207 North Miami, FL, 33161	Name of Employer Self	Date (month, day, year) 8-10-89	Amount of Each Receipt (this Period) 1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Real Estate Developer	Aggregate Year-to-Date > \$ 2000.00	
C. Full Name, Mailing Address and ZIP Code Mr. Enrique G. Terrans 4519 SW 16th Street Miami, Florida, 33134		8-10-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Executive	Aggregate Year-to-Date > \$ 100.00	
D. Full Name, Mailing Address and ZIP Code Mr. Devaldo H. Vento 1530 San Rafael Coral Gables, FL, 33134		8-10-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation EN	Aggregate Year-to-Date > \$ 100.00	
E. Full Name, Mailing Address and ZIP Code Dr. Enrique P. Capero 7921 SW 40th Street Ste. 45 Miami, FL, 33155	Name of Employer Self	Date (month, day, year) 8-10-89	Amount of Each Receipt (this Period) 1000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Physician / ODS	Aggregate Year-to-Date > \$ 1300.00	
F. Full Name, Mailing Address and ZIP Code Mr. Frederick U. Guardabassi 915 Middle River Building 01030 Fort Lauderdale, FL, 33304	Name of Employer Self	Date (month, day, year) 8-10-89	Amount of Each Receipt (this Period) 500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Investor	Aggregate Year-to-Date > \$ 1500	
G. Full Name, Mailing Address and ZIP Code Mr. Jay S. Selby 801 North Venetian Drive Miami, FL, 33139		8-10-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Executive	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional) 2900.00

TOTAL This Period (last page this line number only)

MODULE A

UNITED RECEIPTS

91/131
 PER LINE NUMBER
 1101

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Charles F. Wolfe 777 Brickell Ave. 01000 Miami, FL, 33131	Smith, Barney	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Executive	Aggregate Year-to-Date > \$ 1000.00	
B. Full Name, Mailing Address and ZIP Code Mr. Marshall I. Wolper 714 West B. Lido Drive Miami Beach, FL, 33139	Wolper, Ross	8-25-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Retired/Inventor	Aggregate Year-to-Date > \$ 500.00	
C. Full Name, Mailing Address and ZIP Code Kenyon L. Zapf 4026 SW 9th Terrace Miami, FL, 33134		8-25-89	50.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date > \$ 50.00	
D. Full Name, Mailing Address and ZIP Code Dr. Richard F. Tojara 7300 SW 40th Street Miami, FL, 33155		8-25-89	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date > \$ 300.00	
E. Full Name, Mailing Address and ZIP Code Mr. Frederick M. Guardabassi P.O. Box 753c Fort Lauderdale, FL, 33758	Guardabassi, Assoc.	8-25-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Investor	Aggregate Year-to-Date > \$ 2000.00	
F. Full Name, Mailing Address and ZIP Code Mr. Jay S. Selby 801 North Venetian Drive Miami, FL, 33139	International Contractor	8-25-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: CONTRACTOR	Aggregate Year-to-Date > \$ 1350.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date > \$	
SUBTOTAL of Receipts This Page (optional)			2750.00
TOTAL This Period (fill page this line number only)			

SCHEDULE A

ITEMIZED RECEIPTS

Do not check this box unless you are reporting a contribution of cash or property of the kind that requires reporting on Form 7061.

107 131
FOR LINE 11A
11A1

Any information reported from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committees.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

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A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mary Jeanne Mallstrom 1827 Greenwood Street Evanston, IL, 60201		8-29-89	5.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 5.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mr. A.B. Harrison, Jr.		8-29-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Dr. C.H. Noyes 660 NE 95th Street Ste. 7 Miami Shores, FL, 33120		8-29-89	50.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 50.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Jane Dyan Hultgren		8-29-89	5.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 5.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Annie Hunt 9224 Central Park Evanston, IL, 60203		8-29-89	5.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 5.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mr. William Kestel 5001 SW 105th Street Miami, FL, 33156	Doral Hotel	8-29-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Owner	Aggregate Year-to-Date > \$ 1000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mrs. Robin Kestel 5001 SW 105th Street Miami, FL, 33156		8-29-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Housewife	Aggregate Year-to-Date > \$ 1000.00	

LT

SUBTOTAL of Receipts This Page (topward) 2165.00
 TOTAL This Period (see page 11A line number only)

INVOICE A

ITEMIZED RECEIPTS

See instructions on the back of this form for each category of the General Inflation Report

10/1/89
FORM LINE NUMBER
11A1

IN KIND CONTRIBUTION

Any information obtained from such Reports and Statements may not be sold or used by any person for the purpose of influencing candidates or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Eleana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Lois Alvarez 9800 NW 25 Street Suite 205 MIAMI, FL 33137 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Sentex Security Occupation	9-15-89 Aggregate Year-to-Date > 8	\$200.00 Security
Joe Toledo 2721 West 81st. Miralech, FL 33016 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Dolphin Ice Occupation	9-10-89 Aggregate Year-to-Date > 8	\$200.00 ice
Mrs. Millie Pepono 2472 NW 21 Terrace MIAMI, FL 33142 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Construction Catering Occupation	9-10-89 Aggregate Year-to-Date > 8	\$620.00 Food
NATIONAL Republican Congressional Committee 320 1ST STREET S.E. WASHINGTON D.C. 20003 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Congressional Committee Occupation	8-29-89 Aggregate Year-to-Date > 8	\$500.00 Telephone
Robin Kaskel 5881 SW 105 Street MIAMI, FL 33156 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	housewife Occupation	8-30-89 Aggregate Year-to-Date > 8	\$1000.00 Food
Mrs. Irela Samat 7445 NW 12 Street MIAMI, FL 33166 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Kaufman and Roberts Executive Occupation	8-28-89 Aggregate Year-to-Date > 8	\$569.00 TV + VCR
BIPAC 1747 Pennsylvania Ave. N.W. Washington Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	8-25-89 Aggregate Year-to-Date > 8	\$251.32 Lists

SUBTOTAL of Receipts This Page (optional) \$3340.32

TOTAL This Period (fill page title box number only)

LT

SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

AGE OF 19 1/2
FOR LINE NUMBER: 11 A 1

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

9320149394723

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. William H. Lesne 20251 SW 272nd Street Woodstead, FL, 33731		8-14-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Joseph S. Marzotta 12433 SW 94th Lane Miami, FL, 33186		8-14-89	25.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 25.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Gloria Mayne 8832 Southampton Drive Miramar, FL, 33025		8-19-87	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Physician	Aggregate Year-to-Date > \$ 200.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Joan McNulty 7480 Fairway Drive Suite 106 Miami Lakes, FL, 33016	Current Review Publ.	8-14-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Publisher	Aggregate Year-to-Date > \$ 1100.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. James Elliott Messer P.O. Box 1876 Tallahassee, FL, 32302	Messer, Vickers Law Firm	8-14-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Attorney	Aggregate Year-to-Date > \$ 1000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Leonard Miller 700 NW 107th Avenue Lennar Corporation Miami, FL	Lennar Corp.	8-14-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Executive	Aggregate Year-to-Date > \$ 1000.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Alice E. Morissette 100 Cadisa Avenue Coral Gables, FL, 33124	Frank Hoya + Assoc.	8-14-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Secretary	Aggregate Year-to-Date > \$ 1000.00	

SUBTOTAL of Receipts This Page (signature) 4325.00

TOTAL This Period (next page this line number only)

LT

EDUILL A

ITEMIZED RECEIPTS

This receipt is required for each category of the Qualified Summary Page	PAGE OF 00 131
	FOR LINE NUMBER 11A1

Information covered from such Reports and Statements may not be valid or used by any person for the purpose of soliciting contributions or for commercial gain, or for the purpose of using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

92040891477234

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
Mr. Stuart A. Mishkin 1671 NW 10th Street Miami, FL, 33125	Mishkin & Echembe Occupation: Attorney	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1000.00		
B. Full Name, Mailing Address and ZIP Code Dr. Jack M. Nishkin 5150 La Gorce Drive Miami Beach, FL, 33160	Self Occupation: Dentist	8-25-89	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 200.00		
C. Full Name, Mailing Address and ZIP Code Mr. John D. Montgrose 5353 N. Atlantic Ave. Ste. 415 Delray Beach, FL, 33445	Executive Sports Occupation: Owner	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1000.00		
D. Full Name, Mailing Address and ZIP Code Gisela M. Morales 2469 SW 102nd Court Miami, FL, 33165	Occupation:	8-25-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 100.00		
E. Full Name, Mailing Address and ZIP Code Alva E. Morissette 100 Cadisa Avenue Coral Gables, FL, 3315-	Occupation:	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1000.00		
F. Full Name, Mailing Address and ZIP Code Mr. Chris Shays For Congress 50 Washington St New York, CT 06854	House of Rep. Occupation: Congressman	8-25-89	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 200.00		
G. Full Name, Mailing Address and ZIP Code Elena Respreira 10023 NW 4th Lane Miami, FL, 33172	Garcia Commercial College Occupation: Executive	8-25-89	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 200.00		

SUBTOTAL of Receipts This Page (optional) 3200.00

TOTAL This Period (Fill page this line number only)

115A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 6
51
FOR LINE NUM
11

No portion of any contribution from such reports and statements may not be sold or used by any person for the purpose of soliciting contributions or for contact with any other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Jorge A. Garcia 8973 SW 6th Terrace Miami, FL, 33174 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Self Occupation Accountant Aggregate Year-to-Date > \$ 500.00	8-18-89	500.00
Mrs. Harriett Nixon Hill 200 Kings Highway Carnegie, PA, 15106 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Aggregate Year-to-Date > \$ 25.00	8-18-89	25.00
Mr. M. Guy Gato, Jr. 5623 Yacht Club Road Jacksonville, FL, 32219 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Occupation Aggregate Year-to-Date > \$ 100.00	8-18-89	100.00
Dr. Martiniano L. Urta 3695 N.W. 1st Street Miami, FL, 33125 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Physician Aggregate Year-to-Date > \$ 600.00	8-18-89	300.00
Mr. Juan Perez 3750 W. 11th Avenue Hialeah, FL, 33114 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Occupation Aggregate Year-to-Date > \$ 200.00	8-18-89	200.00
Dr. Barry A. Reed 12245 S.W. 64th Avenue Miami, FL, 33156 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Self Occupation Physician Aggregate Year-to-Date > \$ 100.00	8-18-89	100.00
Mr. Fernando Rodriguez 2690 SW 22nd Ave. 0417 Miami, FL, 33135 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Name of Employer Varadero Supermarket Occupation Grocer Aggregate Year-to-Date > \$ 1000.00	8-18-89	1000.00
SUBTOTAL (All of Receipts This Page (optional))			2225.00
TOTAL (This Period (last page this line number only))			2225.00

LT

MODULE A

FORMED RECEIPTS

Florida Department of Banking Services
 Statewide Automated
 Banking Depository Program

09/18/89
 WITH LINE NUMBER
 11A1

Information reported from each Reporter and Donor to may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such sources.

NAME OF COMMITTEE IN FULL

Ileana Ros-Lehtinen for Congress

9 2 3 0 1 4 3 0 3 3 9 4 7 2 6

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Clara Represa De Guzman 12645 SW 43rd Street Miami, FL, 33175		8-25-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Hugh T. O'Reilly 475 Altondale Road Key Biscayne, FL, 33149		8-25-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. Gar H. Pasaledos 875 Kendall Dr. 0401 MIAMI, Florida, 33176	Self	8-25-89	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Physician	Aggregate Year-to-Date > \$ 250.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Marcelino Perez 10012 SW 23rd Terrace Miami, FL, 33165		8-25-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Mario Pestonit 1885 NW 4th Street Miami, FL, 33136		8-25-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
John R. Elmote 13051 NW 129th Miami FL 33054		8-25-89	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 300.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Fernando Rodriguez 2690 SW 22nd Ave. 0407 Miami, FL, 33135		8-25-89	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 300.00	

SUBTOTAL of Receipts This Page (optional) 1650.00

TOTAL This Period (See page this line number only)

SCHEDULE A

FINANCIAL REPORT

CONTRIBUTIONS FROM OTHER COMMITTEES

Any information reported here with respect to an individual may not be used by any person for the purpose of making contributions or for any other purpose unless such person uses the name and address of the individual contributor to which contributions from such committee

NAME OF CONTRIBUTOR TO FULL			
<p>Ileana Bai - Lentmen for Congress C 0026976</p>			
<p>Full Name, Mailing Address and ZIP Code National Republican Congressional Committee 550 First Street S.E. Washington D.C. 20003</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):</p>	<p>Name of Employee</p> <p>Description</p> <p>Aggregate Year to Date: 0</p>	<p>Date (month day year) 8-7-89</p>	<p>Amount of Cash Received This Period \$ 4,500.00</p>
<p>Full Name, Mailing Address and ZIP Code Special Congressional Fund 1821 Brickell Avenue MIAMI, FL 33131</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):</p>	<p>Name of Employee</p> <p>Description</p> <p>Aggregate Year to Date: 0</p>	<p>Date (month day year) 8-7-89</p>	<p>Amount of Cash Received This Period \$ 19,000.00</p>
<p>Full Name, Mailing Address and ZIP Code Republican National Committee 510 First Street S.E. Washington D.C. 20003</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):</p>	<p>Name of Employee</p> <p>Description</p> <p>Aggregate Year to Date: 0</p>	<p>Date (month day year) 8-7-89</p>	<p>Amount of Cash Received This Period \$ 5000.00</p>
<p>Full Name, Mailing Address and ZIP Code Republican Party of Florida P.O. Box 511 Tallahassee, FL 32302</p> <p>Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):</p>	<p>Name of Employee</p> <p>Description</p> <p>Aggregate Year to Date: 0</p>	<p>Date (month day year) 8-9-89</p>	<p>Amount of Cash Received This Period \$ 4500.00</p>
<p>Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):</p>	<p>Name of Employee</p> <p>Description</p> <p>Aggregate Year to Date: 0</p>	<p>Date (month day year)</p>	<p>Amount of Cash Received This Period</p>
<p>Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):</p>	<p>Name of Employee</p> <p>Description</p> <p>Aggregate Year to Date: 0</p>	<p>Date (month day year)</p>	<p>Amount of Cash Received This Period</p>
<p>Full Name, Mailing Address and ZIP Code</p> <p>Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):</p>	<p>Name of Employee</p> <p>Description</p> <p>Aggregate Year to Date: 0</p>	<p>Date (month day year)</p>	<p>Amount of Cash Received This Period</p>

SUBTOTAL of Receipts This Page (topright) \$ 32,000.00

TOTAL This Period (all pages and this number only) \$ 32,000.00

1989 Termination Report

SCHEDULE A

ITEMIZED RECEIPTS

POLITICAL PARTY COMMITTEES

If this amount is not the full amount of the taxable contribution, please indicate the amount of the taxable contribution here.	TAX ID NUMBER
---	---------------

Any information copied from such reports and documents may not be used or cited by any person for the purpose of making contributions or for any other purpose other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee in Full
The Special Congressional Election Fund

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Received this Period
Republican National Committee 210 1st Street S.E. Washington D.C. 20003 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		8-8-89	\$5,000.00
National Republican Senatorial Committee 425 2nd St. N.E. Washington D.C. 20003 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		8-8-89	\$5,000.00
National Republican Congressional Committee 320 1st Street S.E. Washington D.C. 20003 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		8-8-89	\$5,000.00
B. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

CERTIFIED as Correct This Form (Signature)	\$15,000.00
TOTAL This Period (See page 401 for number only)	\$15,000.00

SCHEDULE A ITEMIZED RECEIPTS

Use aggregate calculated for each category of the Detailed Summary Page

PAGE 2 OF 2
FORM LINE NUMBER 116

POLITICAL PARTY COMMITTEES

All information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Ileana Ros - Lehtinen for Congress

0970430:329:42729

A. Full Name, Mailing Address and ZIP Code
Republican Party of Florida
P.O. Box 311
Tallahassee, FL 32302
Receipt For: Primary General

Name of Employer
Date (month, day, year) 8-11-89
Amount of Each Receipt this Period \$5000.00
Occupation
Aggregate Year-to-Date > 8

B. Full Name, Mailing Address and ZIP Code
Special Congressional Election Fund
1221 Birchell Avenue
MIAMI, FL 33131
Receipt For: Primary General

Name of Employer
Date (month, day, year) 8-16-89
Amount of Each Receipt this Period \$3,600.00
Occupation
Aggregate Year-to-Date > 8 23,600

C. Full Name, Mailing Address and ZIP Code
Receipt For: Primary General

Name of Employer
Date (month, day, year)
Amount of Each Receipt this Period
Occupation
Aggregate Year-to-Date > 8

D. Full Name, Mailing Address and ZIP Code
Receipt For: Primary General

Name of Employer
Date (month, day, year)
Amount of Each Receipt this Period
Occupation
Aggregate Year-to-Date > 8

E. Full Name, Mailing Address and ZIP Code
Receipt For: Primary General

Name of Employer
Date (month, day, year)
Amount of Each Receipt this Period
Occupation
Aggregate Year-to-Date > 8

F. Full Name, Mailing Address and ZIP Code
Receipt For: Primary General

Name of Employer
Date (month, day, year)
Amount of Each Receipt this Period
Occupation
Aggregate Year-to-Date > 8

G. Full Name, Mailing Address and ZIP Code
Receipt For: Primary General

Name of Employer
Date (month, day, year)
Amount of Each Receipt this Period
Occupation
Aggregate Year-to-Date > 8

SUBTOTAL of Receipts This Page (optional) \$8,600.00
TOTAL This Period (last page this line number only) \$35,600.00



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20543

80-2

DEC 7 1969

Richard Preston Tonkinson, Treasurer
Ileana Ros-Lehtinen for Congress
401 Miracle Mile
Coral Gables, FL 33134

Identification Number: C00236976

Reference: 30 Day Post-Special Report (8/10/69-9/10/69)

Dear Mr. Tonkinson:

This letter is prompted by the Commission's further review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Schedule A of your report (pertinent portion attached) discloses a contribution(s) which appears to exceed the limits set forth in the Act. An individual or a political committee other than a qualified multicandidate committee may not make a contribution to a candidate for federal office in excess of \$1,000 per election. Additionally, a multicandidate committee may not make a contribution to a candidate for federal office in excess of \$5,000.00 per election. Also, the contributions received from individuals and political committees by your committee and the Special Congressional Election Fund should be aggregated in order to observe the contribution limitations for these donors. The term "contribution" includes any gift, subscription, loan, advance, or deposit of money or anything of value made by any person for the purpose of influencing any election for federal office. (2 U.S.C. §441a(a) and (f); 11 CFR §110.1(b), (e) and (k))

If the contribution(s) in question was incompletely or incorrectly disclosed, you should amend your original report with the clarifying information. If the contribution(s) you received exceeds the limits, you should either refund to the donor the amount in excess of \$1,000 or \$5,000 (as appropriate), or get the donor to redesignate and/or reattribute the contribution in writing. All refunds, redesignations, and reattributions must be made within sixty days of the treasurer's receipt of the contribution. Copies of

9 2 2 4 10 58 39 14773 0

refund checks and copies of letters reattributing or redesignating the contributions in question may be used to respond to this letter. Refunds are reported on line 20 of the Detailed Summary Page and on Schedule P of the report covering the period in which they are made. Redesignations and reattributions are reported as same entries on Schedule A of the report covering the period in which the authorization for the redesignation and/or reattribution is received. (11 CFR §104.0(d)(2), (3) and (4))

Although the Commission may take further legal steps, prompt action by you to refund or seek redesignation and/or reattribution of the excessive amount will be taken into consideration.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2400.

Sincerely,

Linda Tangney

Linda Tangney
Reports Analyst
Reports Analysis Division

3 2 0 34601 86 93 4 A 3 1



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20543

BQ-3

December 28, 1989

Richard Preston Tonkinson, Treasurer
Ileana Ros-Lehtinen for Congress
401 Miracle Mile, Suite 107
Coral Gables, FL 33134

Identification Number: C00236976

Reference: 30 Day Post-Special Report (8/10/89-9/10/89)

Dear Mr. Tonkinson:

This letter is to inform you that as of December 27, 1989, the Commission has not received your response to our request for additional information, dated December 7, 1989. That notice requested information essential to full public disclosure of your federal election financial activity and to ensure compliance with provisions of the Federal Election Campaign Act (the Act). A copy of our original request is enclosed.

If no response is received within fifteen (15) days from the date of this notice, the Commission may choose to initiate audit or legal enforcement action.

If you should have any questions related to this matter, please contact Linda Tangney on our toll-free number (800) 424-9530 or our local number (202) 376-2480.

Sincerely,

John D. Gibson
for John D. Gibson

Assistant Staff Director
Reports Analysis Division

Enclosure

3 1 3 3 2 6 1 4 8 0 3 9 4 7 3 2

MEMORANDUM FOR FILES: TELECON

SUBJECT: Apparent Excessive Contributions

FROM: Richard Tonkinson

TO: Linda Tangney

NAME OF COMMITTEE: Ros-Lehtinen for Congress (FL)

DATE: 1/23/90

Mr. Tonkinson telephoned to discuss the apparent excessive contributions. Mr. Tonkinson stated that even though he had resigned as treasurer, he would like to respond to the letters the Committee had received regarding the reports he had filed. I suggested that Mr. Tonkinson review the letter I had sent him, and look at the Committee's reports so that he could take appropriate action with regard to the excessive contributions.

92040894733

REGISTERED MAIL

SYSTEM OF RECORDS MANAGEMENT
MAIL ROOM

90 JAN 31 AM 11:57

January 31, 1990

Linda Tanguay
Reports Analyst
Reports Analysis Division
Federal Election Commission
Washington D.C. 20463

131202

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

90 JAN 1 - 831 AM

Reference: Ileana Ros Lehtinen for Congress
C 00236976

Dear Linda:

I am writing to thank you for your valuable cooperation in orienting me as to what the FEC requires in clarifications and corrections to the FEC form 3 reports of 7/14/89, 7/26/89, 8/9/89 and 9/18/89. Our telephone conversation on 1-23-90 was very productive and as a follow up I have the pleasure to send to you the response that you need.

Please note that I received the FEC letters dated 12/28/89, 12/29/89 and 1/5/90 from Debbie Musgrove on 1-22-90. I believe that the reason for the delay was because the letters were addressed to the former campaign headquarters at 401 Miracle Mile Suite 107 Coral Gables, Florida 33134. There is no headquarters at that address and the files of the campaign have been in my home up to 1-22-90.

As discussed on the telephone, I am no longer the Treasurer of the Ileana Ros Lehtinen for Congress campaign as of 12-31-89 because my employer has only given me permission to serve as Treasurer up to that date. Ileana has been informed of the resignation as of 1-6-90 and I understand that she is in the process of finding a replacement. I will not complete the FEC form 3 for January 31, 1990.

However, because of my responsibilities as Treasurer during the time that these reports were completed and because I have the detailed knowledge of these specific reports, I want to provide you with the response required rather than have some one else try to educate themselves on the reports and then attempt to respond to your request.

As for the 7/14/89 report, Dr. Caridad E. Gonzalez on 7-8-89 gave \$2,000 of which \$1,000 was for the primary election and \$1,000 was for the general election. The correction is attached.

As for the 7/26/89 report, the aggregate totals for the PAC's are shown on the corrected entry sheets.

6091389333

The 7/26/89 report shows an ending balance of \$66,637.96 and the 8/9/89 should have a beginning balance of \$66,637.96 and not the \$68,272.86 that was posted. The correction was made on line 11 a iii column B where the total of \$71,271.05 of the 8/9/89 column A plus \$309,706.20 of the column B total of 7/26/89 adds up to \$380,977.85 and not the \$382,338.06 that was posted. The necessary corrections on the 8/9/89 report and the 9/18/89 have been made. The ending balance for the 8/9/89 report is now \$54,706.22.

Line 16 for columns A and B for the 8/9/89 report are now entered on the revised detailed summary page.

The American Family PAC gave \$5,000 on 7/13/89 for the primary and \$5,000 on 8/7/89 for the general election. The aggregate year to date has been corrected on the attached page.

The aggregate year to date totals for the PAC's are now entered for the 8/9/89 report and are attached.

As for the 9/18/89 report, the loan from Ilona Ros Lehtinen has been now properly posted. I have entered the loan into schedule C and omitted it from schedule D. The schedule B to support the repayment of the \$34,000 for line 19 a is completed and the proper entries have been made for lines 13 a and c and 19 a and c for columns A and B. The corrections have also been made to the entries for totals. Attached are the revised pages.

The Republican Leaders Fund PAC contributed \$2500 on 8/22/89 and \$2500 on 8/29/89 and the aggregate year to date as of 8/29/89 is \$5,000. The corrected entry is attached.

In regard to the excessive contributions made by individuals, please note the attached letters that have been written to these contributors and our efforts to correct the situation.

As for the excessive contributions to the general election on the part of the Republican Party of Florida, the National Republican Congressional Committee and the Republican National Committee, please note the attached letters to these contributors and our efforts to correct the situation.

I believe that this should satisfy the numerous items that we discussed.

Sincerely,

Richard Tonkinson

Richard Tonkinson

January 24, 1990

Mrs. Robin Kassel
3801 S.W. 105th Street
Miami, Florida 33156

Dear Mrs. Kassel:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you contributed \$2,000 for the general election campaign which is \$1,000 more than is permitted by federal law for an election cycle.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$1,000 can be considered a contribution by a relative that is over 21 years old and that the funds are his/hers and not a gift from you. Please note that Mr. Kassel has also contributed a \$1,000 to the general election and consequently, he also has given the maximum contribution allowed by law. Also note that \$1,000 of the \$2,000 of your contribution is in kind contribution and not funds.

If this is not possible then your letter should state that the \$1,000 should be used to retire campaign debts or to be used in Ileana's reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
3757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Musgrove at 262-1800.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

27-9014309 83 4 3 4 3 6

January 24, 1990

Mr. Fredrick W. Guardabassi
P.O. Box 7336
Fort Lauderdale, Florida 33388

Dear Mr. Guardabassi:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you contributed \$1,500 for the general election campaign which is \$500 more than is permitted by federal law for an election cycle.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$500 can be considered a contribution by your wife or relative that is over 21 years old and that the funds are theirs and not a gift from you.

If this is not possible then your letter should state that the \$500 should be used to retire campaign debts or to be used in Ileana's reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
3757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Musgrove at 262-1800.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

00713893161

January 24, 1990

Alma Morissette
100 Cadina Avenue
Coral Gables, Florida 33134

Dear Alma:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you contributed \$2,000 for the general election campaign which is \$1,000 more than is permitted by federal law for an election cycle.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$1,000 can be considered a contribution by your husband or relative that is over 21 years old and that the funds are theirs and not a gift from you.

If this is not possible then your letter should state that the \$1,000 should be used to retire campaign debts or to be used in Ileana's reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Musgrove at 262-1600.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

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January 28, 1989

Republican Party of Florida
P.O. Box 311
Tallahassee, Florida 32302

Dear Sirs:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you have made excessive contributions to her campaign. Specifically you made \$4,500 contribution on 8/9/89 and a \$5,000 on 8/11/89 you contributed \$5,000. Therefore the total contribution to the general election cycle is \$10,000 which is \$5,000 more than what is permitted by federal law.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$5,000 can be used to retire campaign debts or be considered as a contribution to her reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Musgrove at (305) 262-1800.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

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January 25 1989

National Republican Congressional
Committee
320 1st Street S.E.
Washington D.C. 20003

Dear Sirs:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you have made excessive contributions to her campaign. Specifically, you made a \$5,000 contribution on 8/8/89 to the Special Congressional Election Fund which became an authorized committee of the Ileana Ros Lehtinen for Congress on 8/23/89. You have also contributed \$4,500 to the Ileana Ros Lehtinen for Congress on 8/7/89. Because of the Special Congressional Election Fund became a committee of the campaign, your total contribution to the campaign is therefore \$9,500 which is \$4,500 more than what is permitted by federal law for a general election cycle.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$4,500 can be used to retire campaign debts or be considered as a contribution to her reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Musgrove at (305) 262-1800.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

1989 Amended #0 Day Special Post General Report

January 25, 1989

Republican National Committee
310 1st Street S.E.
Washington D.C. 20003

Dear Sirs:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you have made excessive contributions to her campaign. Specifically, you made a \$5,000 contribution on 8/8/89 to the Special Congressional Election Fund which became an authorized committee of the Ileana Ros Lehtinen for Congress on 8/23/89. You have also contributed \$5,000 to the Ileana Ros Lehtinen for Congress on 8/7/89. Because of the Special Congressional Election Fund became a committee of the campaign, your total contribution to the campaign is therefore \$10,000 which is \$5,000 more than what is permitted by federal law for a general election cycle.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$4,500 can be used to retire campaign debts or be considered as a contribution to her reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
8757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Mungrove at (305) 262-1800.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

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REPORT NOTICE

ATTACHMENT #9
Page 1 of 3

FEDERAL ELECTION COMMISSION

FLORIDA SPECIAL

June 26, 1989

WHO MUST FILE

PRINCIPAL CAMPAIGN COMMITTEES OF CONGRESSIONAL "CANDIDATES" who seek election in the August 1, 1989, Florida Special Election.

WHAT MUST BE REPORTED

All financial activity that occurred during the reporting period (or before, if not previously reported).

REPORTING FORMS

Candidate committees use FORM 3 (enclosed). If the campaign has more than one authorized committee, the principal campaign committee must also file a consolidated report on FORM 3Z.

WHERE TO FILE

Consult the instructions on the back of the FORM 3 Summary Page. Note state filing requirements also.

LABEL

Committees should affix the peel-off label from the envelope to Line 1 of the report. Corrections should be made on the label.

LAST-MINUTE CONTRIBUTIONS

Committees which receive a contribution of \$1,000 or more, between 20 and 2 days before the election, must report it within 48 hours of its receipt.

COMPLIANCE

TREASURERS OF POLITICAL COMMITTEES ARE RESPONSIBLE FOR FILING ALL REPORTS ON TIME. FAILURE TO DO SO IS SUBJECT TO ENFORCEMENT ACTION. COMMITTEES FILING ILLEGIBLE REPORTS OR USING NON-FEC FORMS WILL BE REQUIRED TO REFILE.

FOR INFORMATION, Call: Information Services Division
202/376-3120 or 800/424-9530

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CALENDAR OF REPORTING DATES FOR FLORIDA SPECIAL ELECTION

Chart 1: Committees involved in only the Special Primary (8/1/89):

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE ^{1/}	FILING DATE
Pre-Primary and Mid-Year ^{2/}	-- ^{3/} - 07/12/89	07/17/89	07/20/89
Year-End	07/13/89 - 12/31/89	01/31/90	01/31/90

**Chart 2: Committees involved in only the Special Primary (8/1/89)
and Special General (8/29/89):**

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE ^{1/}	FILING DATE
Pre-Primary and Mid-Year ^{2/}	-- ^{3/} - 07/12/89	07/17/89	07/20/89
Pre-General	07/13/89 - 08/09/89	08/14/89	08/17/89 [~]
Post-General	08/10/89 - 09/18/89	09/28/89	09/28/89
Year-End	09/19/89 - 12/31/89	01/31/90	01/31/90

NOTE: If no candidate achieves a majority of the vote in his/her party's Special Primary Election, the top two vote getters from that party's primary go to a Special Runoff Election.

- ^{1/}Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.
- ^{2/}Committees may file a consolidated Pre-Primary and Mid-Year Report, provided the report is filed by 7/20/89.
- ^{3/}The close of books of the last report filed or the date of the committee's first activity, if no previous reports filed.
- ^{4/}Committees involved in the Runoff Election may use the August 3 filing date as the mailing date for their Pre-Runoff Report.

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Chart 3: Committees involved in both the Special Primary (8/1/89) and Special Runoff (8/15/89):

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE ^{1/}	FILING DATE
Pre-Primary and Mid-Year ^{2/}	-- ^{3/} - 07/12/89	07/17/89	07/20/89
Pre-Runoff	07/13/89 - 07/26/89	08/03/89 ^{4/}	08/03/89
Year-End	07/27/89 - 12/31/89	01/31/90	01/31/90

CHART 4: Committees involved in the Special Primary (8/1/89), Special Runoff (8/15/89) and Special General (8/29/89)

REPORT	PERIOD COVERED	REG./CERT. MAILING DATE ^{1/}	FILING DATE
Pre-Primary and Mid-Year ^{2/}	-- ^{3/} - 07/12/89	07/17/89	07/20/89
Pre-Runoff	07/13/89 - 07/26/89	08/03/89 ^{4/}	08/03/89
Pre-General	07/27/89 - 08/09/89	08/17/89 ^{5/}	08/17/89
Post-General	08/10/89 - 09/18/89	09/28/89	09/28/89
Year-End	09/19/89 - 12/31/89	01/31/90	01/31/90

NOTE: If no candidate achieves a majority of the vote in his/her party's Special Primary Election, the top two vote getters from that party's primary go to a Special Runoff Election.

^{1/}Reports sent by registered or certified mail must be postmarked by the mailing date. Otherwise, they must be received by the filing date.

^{2/}Committees may file a consolidated Pre-Primary and Mid-Year Report, provided the report is filed by 7/20/89.

^{3/}The close of books of the last report filed or the date of the committee's first activity, if no previous reports filed.

^{4/}Committees involved in the Runoff Election may use the August 3 filing date as the mailing date for their Pre-Runoff Report.

^{5/}Committees involved in the Runoff and General Elections may use the August 17 filing date as the mailing date for their Pre-General Report.

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SCHEDULE A

1991
 Full Time Member
 N A I

Any information copied from such reports and documents may not be used or cited by any person for the purpose of soliciting contributions or for disclosure to any person, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE TO FUND

Ileana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. C. H. Gilliland 3901 SW 70th Lane Gainesville, FL, 32644		8-11-89	25.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 25.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. William Darby Glenn 28 Arvida Pkwy Coral Gables, FL, 33134	Self	8-11-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Dentist	Aggregate Year-to-Date > \$ 500.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Dr. Frances B. Glenn 28 Arvida Pkwy. Coral Gables, FL, 33134	Self	8-11-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Physician	Aggregate Year-to-Date > \$ 500.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Juan Gonzalez 1023 NW 23rd Street Miami, FL, 33127		8-11-89	25.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Tailor	Aggregate Year-to-Date > \$ 25.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. William B. Griffin PO Box 25448 Sarasota, FL, 34277	Riscorp	8-11-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President	Aggregate Year-to-Date > \$ 1000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Bob High 921 NW 19th Street Miami, FL, 33149		8-11-89	25.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 25.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Wade L. Happing North Side Road Tallahassee, FL, 32303	Happing, Boyd, Green & Associates	8-11-89	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation President	Aggregate Year-to-Date > \$ 500.00	

8 9 0 1 3 9 5 1 3 9 5

SUBTOTAL of Receipts This Page (captioned)	2325.00
TOTAL This Period (next page this line number only)	

SCHEDULE A

STANDARD RECEIPTS

Amounts contributed by each category of the Standard Post Report

92 1/31
FOR LABEL NUMBER
11 A1

Any information copied from each Report and Statement may not be sold or used by any person for the purpose of obtaining contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE in Full

Eleana Ros-Lehtinen for Congress

92013931329

Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
William M.B. Wood 1540 Mercado Ave. Coral Gables FL 33146	Self	8-16-89	1771.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Attorney Aggregate Year-to-Date > \$ 1100.00		
Michael B. Sullivan 7391 SW 156 ST Miami FL 33157		8-16-89	50.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$ 30.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

1650.00

TOTAL This Period (see page 6) (do not number only)

MODULE A

STANDARD RECEIPTS

Keep this receipt with each copy of the Standard Summary Page

44 1/81
FOR LINE NUMBER
11A

All information copied from such reports and documents may not be sold or used by any person for the purpose of soliciting contributions or for commercial or other uses, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE OR FUND

Ileana Ros-Lehtinen for Congress

C 3301330.894749

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mr. James J. Blosser PO Box 1900 Ft Lauderdale FL, 33302	Ruder, Barnett et al Occupation: Attorney	8-17-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 1250.00		
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Milfred H. Bond 130 NE Necken Avenue Port Charlotte, FL, 33752		8-17-89	10.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 20.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mr. Armando H. Codina 150 N. Flagler St. 1500 Miami, FL, 33136	Codina Group Inc. Occupation: Executive	8-17-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mr. Gladstone A. Cooper 13101 SW 69th Court Miami, FL, 33156	Traco Construct. Occupation: Executive	8-17-89	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mr. Alfredo Cortina P.O. Box 321762 Miami, FL, 33132		8-17-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mr. William E. Orier 99 SE 5th Street Miami, FL, 33131	McFarland & Orier Occupation: Advertising	8-17-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 500.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Elsa Eaton 201 Candon Blvd. Key Biscayne, FL, 33149		8-17-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 2000.00		

SUBTOTAL of Receipts This Page (optional) 3760.00

TOTAL This Period (last page this line number only)

4

SCHEDULE A

FINANCED RECEIPTS

Do not check this box unless you are reporting a receipt from a political committee to which contributions from such committee

65 1/31
 Total Line Items:
 11 A

Any information copied from such reports and documents may not be sold or used by any person for the purpose of soliciting contributions or for any other commercial purpose, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee in Full

Ileana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
✓ Dr. David E. Young 88 W. Flagler Street Miami, FL, 33130-1044 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Attorney Aggregate Year-to-Date > \$ 100.00	8-21-89	100.00
Dr. Kayon L. Zapf 4006 SW 9th Terrace Miami, Florida, 33134 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$ 50.00	8-2-89	50.00
C. P. - Juma, Mailing Address with ZIP Code Jorge Munilla 1401 SW 1 st St 210 Miami FL 33135 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Aggregate Year-to-Date > \$ 200.00	8-21-89	100.00
D. Full Name, Mailing Address and ZIP Code Manuel Smolowitz 17400 SW 50 ct. Ft Lauderdale, FL Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer: J Plus 2 Occupation: Owner Aggregate Year-to-Date > \$	Date (month, day, year): 8-21-89	Amount of Each Receipt this Period: 1000.00
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > \$	Date (month, day, year):	Amount of Each Receipt this Period:
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > \$	Date (month, day, year):	Amount of Each Receipt this Period:
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer: Occupation: Aggregate Year-to-Date > \$	Date (month, day, year):	Amount of Each Receipt this Period:

R 2 0 1 3 8 5 1 2 3 7

Total of Receipts This Page (amount) 1250.00
 Total This Period (sum page this line number only)

MODULE A

03 1/1
 FOR LINE NUMBER
 11 A 1

Information copied from such reports and documents may not be used or cited by any person for the purpose of making contributions or for commercial gain, other than using the name and address of any political candidate to which contributions from such committee.

NAME OF COMMITTEE OR FUND

Ileana Ros-Lehtinen for Congress

9 8 2 0 7 4 1 0 3 8 9 5 4 A 7 2

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Luis Ajami 2863 Irvington Avenue Miami, FL, 33122 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Post Buckley Occupation: Engineer Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
Mr. William Alexander 12601 SW 193rd Avenue Miami, FL, 33176 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 100.00	8-25-89	100.00
Georgina A. Alvarez 6887 Fountainbleau Blvd. #102 Miami, FL, 33172 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 50.00	8-25-89	50.00
George Batchelor P.O. Box 22222 Miami, Florida, 33152 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation: Aviation Executive Aggregate Year-to-Date > \$ 500.00	8-25-89	500.00
Mr. Brian Brown 2800 Biscayne Blvd Miami FL 33137 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation: Owner Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
Mr. James R. Brown 5300 SW 82nd Ave. Miami, FL, 33155 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 150.00	8-25-89	150.00
Mr. Jose R. Dulac 6855 Le June Rd. Coral Gables, FL, 33134-2857 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 100.00	8-25-89	100.00

SUBTOTAL of Receipts This Page (optional) 2900.00

TOTAL This Period (See page 268 line number only)

MODULE A

STANDARD RECEIPTS

ON 1/31
FOR LINE NUMBER
11A1

Information reported from such Reports and Statements may not be used by any person for the purpose of making contributions or for commercial gain, other than using the name and address of any political committee to solicit contributions from such contributors.

NAME OF COMMITTEE IN FULL

Ileana Ros-Lehtinen for Congress

R 7 3 1430985914793

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt (this Period)
Dr. George E. Burch P.O. Box 230332 West Shores, FL, 33143		8-25-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt (this Period)
Dr. Thomas F. Carey 260 Palcross Drive Miami Beach FL 33154		8-25-89	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Occupation Retired	Aggregate Year-to-Date > \$ 250.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt (this Period)
Mr. Marc L. Catalano 2301 Bohann Drive Miramar, FL, 33033		8-25-89	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Occupation	Aggregate Year-to-Date > \$ 250.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt (this Period)
Conservative Victory Fund 422 1st Street Washington, D.C., 20003		8-25-89	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Occupation	Aggregate Year-to-Date > \$ 300.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt (this Period)
Mr. Ed Corlett, III 116 W. Flagler Street Miami, FL, 33130	Self	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Occupation Attorney	Aggregate Year-to-Date > \$ 1000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt (this Period)
Conillo A. De Angelis		8-25-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Occupation	Aggregate Year-to-Date > \$ 100.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt (this Period)
Mrs. Corann J. Bearing 600 Grapevine Dr. NW Daytona Beach, FL 32114		8-25-89	50.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Occupation	Aggregate Year-to-Date > \$ 50.00	
SUBTOTAL of Receipts This Page (optional)			2050.00
TOTAL This Period (sum page this line number only)			

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Information reported here must be correct and supporting copies will be held or used for any action for the purpose of collecting contributions or for enforcement purposes, other than using the name and address of any political committee to collect contributions from such contributors.

I leave Res- Lehtinen for Congress

R 9 7 1 3 8 5 1 7 7 2

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipts this Period
Dr. Enrique Diaz 700 NE Le Jeune Rd. Ste. 200 Miami, FL, 33126 Recipient For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Self Physician Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
Dr. Raul P. Diaz 10125 NW 9th Street 0102 Miami, Florida, 33172 Recipient For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 30.00	8-25-89	30.00
Dr. John L. Estlin 7302 SW 26th Avenue Miami, FL, 33143 Recipient For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Faray's Restaurant Server Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
Dr. Concepcion Fernandez 1201 SW 1st Street Miami, FL, 33135 Recipient For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 100.00	8-25-89	100.00
Mrs. Martha H. Fischer 8137 Procca Street Jacksonville, FL, 32217 Recipient For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > \$ 25.00	8-25-89	25.00
Dr. Eddy Franco 1385 Coral Way Ste. 204 Miami, FL, 33145 Recipient For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Self Architect Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
Dr. Donald J. Gertz 100 N. Brickell Blvd. 0200 Miami, FL, 33132 Recipient For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Hospice Care of Delaware Inc. Vice Chairman Aggregate Year-to-Date > \$ 500.00	8-25-89	500.00

3655.00

DISBURSEMENTS of Receipts This Page (optional)

TOTAL This Period (Sum page 016 line number only)

MODULE A

86 1/21
FOR LINE NUMBER
11 A 1

All information copied from such reports and statements may not be valid or used for any purpose for the purpose of collecting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE IN FULL

Ileana Ros-Lehtinen for Congress

R 2040394753
R 3713831973

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipts this Period
Mr. Juan E. Garcia 1948 West 64th Street Maitich, FL, 33112 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	_____ Occupation: _____ Aggregate Year-to-Date > \$ 100.00	8-25-89	100.00
Jacqueline Garcia Respreira 689 NW 114th Avenue #204 Miami, FL, 33172 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	_____ Occupation: _____ Aggregate Year-to-Date > \$ 100.00	8-25-89	100.00
Mr. Earl Gustinger 714 Billie Drive Miami Beach, FL, 33139 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Self Occupation: Insurance Aggregate Year-to-Date > \$ 100.00	8-25-89	100.00
Mr. Van Hiberts 16475 Golf Club Road Ft. Lauderdale, FL, 33322 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	_____ Occupation: _____ Aggregate Year-to-Date > \$ 100.00	8-25-89	100.00
Mr. Kermit R. Millie _____ Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	_____ Occupation: _____ Aggregate Year-to-Date > \$ 40.00	8-25-89	40.00
Key Biscayne Rep. Boaters Club 365 Harbor Ln. Key Biscayne FL 32149 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	_____ Occupation: _____ Aggregate Year-to-Date > \$ 99.00	8-25-89	99.00
Dr. Josephine Earl 429 S. Dixie Hwy. Coral Gables, FL, 33146 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (Specify):	Self Occupation: Psychiatrist Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
SUBTOTAL of Receipts This Page (optional)			1539.00
TOTAL This Period (See page 11 for number only)			1539.00

MODULE A

UNITED RECEIPTS

(See separate instructions for each category of the Detailed Summary Page)

281
87 1131
FOR LINE NUMBER
11A1

Information reported from each Receipt and Statement may not be sold or used by any person for the purpose of soliciting contributions or for commercial gain, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE TO PAID

Ileana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this Period
Mr. Elmer Loyva 930 NE 30th Avenue Miami, FL, 33125 Receipt For: <input type="checkbox"/> Other (specify): <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation Aggregate Year-to-Date > \$ 50.00	8-25-89	50.00
B. Full Name, Mailing Address and ZIP Code Mr. Robert L. Lipton 1633 Northview Drive Miami Beach, FL, 33140 Receipt For: <input type="checkbox"/> Other (specify): <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Occupation Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
C. Full Name, Mailing Address and ZIP Code Mr. John Lowell, Jr. 185 S. Sunrise Avenue Coral Gables, FL, 33135 Receipt For: <input type="checkbox"/> Other (specify): <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Tishman Spier Occupation Developer Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
D. Full Name, Mailing Address and ZIP Code Mrs. Kathleen Lowell 185 S. Sunrise Avenue Coral Gables, FL, 33135 Receipt For: <input type="checkbox"/> Other (specify): <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Occupation Housewife Aggregate Year-to-Date > \$ 1000.00	8-25-89	1000.00
E. Full Name, Mailing Address and ZIP Code Mr. Edward J. Rooney 174 Central St Lowell, MA 01852 Receipt For: <input type="checkbox"/> Other (specify): <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Self Occupation Attorney Aggregate Year-to-Date > \$ 25.00	8-25-89	25.00
F. Full Name, Mailing Address and ZIP Code Mr. Jay Herbas 609 North Shore Drive Miami Beach, FL, 33141 Receipt For: <input type="checkbox"/> Other (specify): <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Steal, Hector + Davis Occupation Attorney Aggregate Year-to-Date > \$ 500.00	8-25-89	500.00
G. Full Name, Mailing Address and ZIP Code Mr. Cesar Rodol 1750 West 46th Street 0119 Hialeah, FL, 33012 Receipt For: <input type="checkbox"/> Other (specify): <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Occupation Aggregate Year-to-Date > \$ 100.00	8-25-89	100.00
TOTAL of Receipts This Page (optional) All This Period (see page 40 for number only)			3675.00

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ITEMIZED RECEIPTS

The amount reported for each category of the Qualified Summary Page

ADP of 00 1/31 FOR LINE 00,000 A 11 A 1

Amounts collected from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

9 2 0 4 0 8 9 4 7 5 7

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Stuart A. Mishkin 1471 NW 10th Street Miami, FL, 33125	Mishkin & Eclembie Occupation: Attorney	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date > \$ 1000.00		
L. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
E. Jack M. Nishkin 1500 La Grèce Drive Pleasant Beach, FL, 33154	Self Occupation: Dentist	8-25-89	200.00
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date > \$ 200.00		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. John D. Montgomery 5353 W. Atlantic Ave. Ste. 401 Delray Beach, FL, 33445	Executive Sports Occupation: Owner	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date > \$ 1000.00		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Celia M. Morales 2409 SW 10th Court Miami, FL, 33165		8-25-89	100.00
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date > \$ 100.00		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Aira E. Mosssette 100 Cadena Avenue Coral Gables, FL, 33134		8-25-89	1000.00
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date > \$ 1000.00		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mr. Chris Shays For Congress 200 Lexington Street Newark, CT 06104	House of Rep. Occupation: Congressman	8-25-89	200.00
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date > \$ 200.00		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Elena Resperera 10023 NW 4th Lane Miami, FL, 33172	Garcia Commercial College Occupation: Executive	8-25-89	200.00
Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Aggregate Year-to-Date > \$ 200.00		
SUBTOTAL of Receipts This Page (optional)			3200.00
TOTAL This Period (last page the line number only)			

MODULE A

FINANCIAL REPORTS

For use only on the
Detailed Summary Page

90 1/31
FOR LINE NUMBER
11A1

Information shown from each Report and Statement may not be used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

8 7 7 5 1 4 9 7 7 5 8

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (this Period)
Mr. Thomas Edward Glynn 951 So Sola Rd. #433 Boca Raton, FL, 33432	Occupation _____	8-25-89	100.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	Aggregate Year-to-Date > \$ 100.00		
B. Full Name, Mailing Address and ZIP Code Ovidio Valderrama 8001 SW 64th Avenue Miami, FL, 33155	Name of Employer _____ Occupation _____	Date (month, day, year) 8-25-89	Amount of Each Receipt (this Period) 50.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	Aggregate Year-to-Date > \$ 50.00		
C. Full Name, Mailing Address and ZIP Code Voter Jcgt Campaign Committee 4502 Harrod Place Fairfax, VA, 22032	Name of Employer House of Rep. Occupation Congressman	Date (month, day, year) 8-25-89	Amount of Each Receipt (this Period) 1000.00 ^{LT}
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	Aggregate Year-to-Date > \$ 1000.00		
D. Full Name, Mailing Address and ZIP Code D. Joaquin Vega 8333 SW 27th Avenue Miami, Florida, 33155	Name of Employer _____ Occupation _____	Date (month, day, year) 8-25-89	Amount of Each Receipt (this Period) 150.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	Aggregate Year-to-Date > \$ 150.00		
E. Full Name, Mailing Address and ZIP Code Mr. Steven F. Whithead 809 Ridge Place Falls Church, VA, 22046	Name of Employer _____ Occupation _____	Date (month, day, year) 8-25-89	Amount of Each Receipt (this Period) 30.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	Aggregate Year-to-Date > \$ 30.00		
F. Full Name, Mailing Address and ZIP Code Mr. Paul S. Whithead 809 Ridge Place Falls Church, VA, 22046	Name of Employer _____ Occupation _____	Date (month, day, year) 8-25-89	Amount of Each Receipt (this Period) 30.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	Aggregate Year-to-Date > \$ 30.00		
G. Full Name, Mailing Address and ZIP Code Mr. Matthew P. Whithead 809 Ridge Place Falls Church, VA, 22046	Name of Employer _____ Occupation _____	Date (month, day, year) 8-25-89	Amount of Each Receipt (this Period) 15.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify): _____	Aggregate Year-to-Date > \$ 15.00		
SUBTOTAL of Receipts This Page (optional)			1375.00
TOTAL This Period (last page this line number only)			

ALEA

UNITIZED RECEIPTS

Receipts (page 1 of 2)
Qualified Quarterly Report

91 1/3
NON LINE NUMBER
11A1

Information learned from such Reports and Statements may not be sold or used by any person for the purpose of collecting contributions or for commercial or other than using the name and address of any political committee to collect contributions from such committees.

FOR COMMITTEE (in Full)

Eleana Ros-Lehtinen for Congress

25210408940

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this Period
Mr. Charles F. Wolfe 777 Brickell Ave. 81000 Miami, FL, 33131	Smith, Barney	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Executive	Aggregate Year-to-Date > \$ 1000.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this Period
Mr. Marshall I. Wolper 714 West Dr Lido Drive Miami Beach, FL, 33139	Wolper Ross	8-25-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Retired / Investor	Aggregate Year-to-Date > \$ 500.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this Period
Kenyon L. Zapf 6426 SW 9th Terrace Miami, FL, 33134		8-25-89	50.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date > \$ 50.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this Period
Dr. Richard F. Tejera 7300 SW 48th Street Miami, FL, 33155		8-25-89	200.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date > \$ 200.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this Period
Mr. Frederick M. Guardabassi P.O. Box 7531 Fort Lauderdale, FL, 33328	Guardabassi + Assoc.	8-25-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: Investor	Aggregate Year-to-Date > \$ 2000.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this Period
Mr. Jay S. Solby 801 North Venetian Drive Miami, FL, 33139	International Contractor	8-25-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation: EXECUTIVE	Aggregate Year-to-Date > \$ 1350.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Cash Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation:	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional) 2750.00

TOTAL This Period (fill page title line number only)

SALE A

UNITED RECEIPTS

Information copied from each Receipt and Statement may not be used in other than using the name and address of any qualified user unless

FOR COMMITTEES (in Full)

Ileana Ros-Lehtinen

A. Full Name, Mailing Address and ZIP Code

Mr. Charles F. Wolfe
777 Brickell Ave. 01000
Miami, FL, 33131

Receipt For: Primary General
 Other (specify):

B. Full Name, Mailing Address and ZIP Code

Mr. Marshall I. Welper
714 West Si Lido Drive
Miami Beach, FL, 33139

Receipt For: Primary General
 Other (specify):

C. Full Name, Mailing Address and ZIP Code

Kenyon L. Zapf
4426 SW 9th Terrace
Miami, FL, 33134

Receipt For: Primary General
 Other (specify):

D. Full Name, Mailing Address and ZIP Code

Dr. Richard F. Tejera
7300 SW 48th Street
Miami, FL, 33155

Receipt For: Primary General
 Other (specify):

E. Full Name, Mailing Address and ZIP Code

Mr. Frederick M. Guardabassi
P.O. Box 753t
Fort Lauderdale, FL, 33358

Receipt For: Primary General
 Other (specify):

F. Full Name, Mailing Address and ZIP Code

Mr. Jay S. Salby
801 North Venetian Drive
Miami, FL, 33139

Receipt For: Primary General
 Other (specify):

G. Full Name, Mailing Address and ZIP Code

Receipt For: Primary General
 Other (specify):

2521040394

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (fill page with line number only)

MODULE A

STANDARD RECEIPTS

The amount reported for each category of the Standard Receipts Page

125
PAGE LINE NUMBER
12

Information reported from such Reports and Documents may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such agencies.

NAME OF COMMITTEE TO PAID

Ileana Ros-Lehtinen for Congress

02023403852022

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
ANCPA Effect. Legislation PAC 1435 Pennsylvania Ave. NW Washington, D.C., 20004-1007 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Aggregate Year-to-Date > \$ 1000.00	8-11-89	1000.00
B. Full Name, Mailing Address and ZIP Code American Radical PAC 1101 Vermont Avenue NW Washington, D.C., 20005 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 2500.00	8-11-89	2500.00
C. Full Name, Mailing Address and ZIP Code Business-Industry PAC 1747 Pennsylvania Avenue NW Washington, DC, 20006 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 1000.00	8-11-89	1000.00
D. Full Name, Mailing Address and ZIP Code Florida Health PAC P.O. Box 60099 Jacksonville, FL, 32234-0099 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 1000.00	8-11-89	1000.00
E. Full Name, Mailing Address and ZIP Code Florida Medical PAC P.O. Box 8411 Jacksonville, FL, 32203 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 2500.00	8-11-89	2500.00
F. Full Name, Mailing Address and ZIP Code STE Good Gov't Club PAC 315 S. Calhoun Street Tallahassee, FL, 32301 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 1000.00	8-11-89	1000.00
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
NETOTAL of Receipts This Page (optional)			3000.00
NETAL This Period (see page 10 for number only)			

MODULE A

ITEMIZED RECEIPTS

Use amount indicated for each category of the Detailed Summary Page

25
PER LINE CHANGE:
N/C

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
IMPAC Monaco Building 300 West Main Street Lexington, Kentucky, 40201		8-11-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 2500.00	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
LUPAC 1722 F Street, NW Washington, DC, 20004		8-11-89	5000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 5000.00	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
MAIL PAC 499 S Capital Street SW Suite 401 Washington, DC, 20002		8-11-89	350.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 350.00	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
U S West PAC 1801 California Street Suite 2040 Denver, CO, 80202		8-11-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
UNOCAL PAC 1201 West 5th Street Room R-101 Los Angeles, CA, 90017		8-11-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$ 500.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Young Republican PAC 1277 K Street NW Ste 71 Washington, DC, 20005		8-11-89	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation EXECUTIVE DIRECTOR	Aggregate Year-to-Date > \$ 250.00	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
SUBTOTAL of Receipts This Page (optional)			7100.00
TOTAL This Period (fill page this line number only)			

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MODULE A

UNITED RECEIPTS

and license information of each employer of the United Summary Post

FORM NO. 1000-1
1-85
FOR LINE NUMBER
12

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial use, other than using the name and address of any political committee to which contributions were such committees.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Citizens & Southern Corp. PAC 60 W 6th Street Miami, FL, 33130	Occupation	8-25-89	250.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > 8	250.00	
B. Full Name, Mailing Address and ZIP Code Council for Nat'l Defense PAC 7015 Old Kennel Hill Road Springfield, VA, 22150	Name of Employer	8-25-89	300.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > 8	300.00	
C. Full Name, Mailing Address and ZIP Code Credit Union Legislative PAC 605 15th Street NW Ste. 300 Washington, D.C., 20005-2207	Name of Employer	8-25-89	1000.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > 8	1000.00	
D. Full Name, Mailing Address and ZIP Code Merck PAC P.O. Box 2000 Rahway, N.J., 07065	Name of Employer	8-25-89	500.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > 8	500.00	
E. Full Name, Mailing Address and ZIP Code NDPE PAC 1420 King Street Alexandria, VA, 22314	Name of Employer	8-25-89	750.00
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > 8	750.00	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > 8		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date > 8		

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TOTAL of Receipts This Page (optional) 2800.00

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FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20541

NOV 7 1989

Richard Preston Tonkinson, Treasurer
Ros-Lehtinen for Congress Committee
401 Miracle Mile, Suite 107
Coral Gables, FL 33134

Identification Number: C00236976

Reference: 30 Day Post-Special Report (8/10/89-9/10/89)

Dear Mr. Tonkinson:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. The review raised questions concerning certain information contained in the report(s). An itemization follows:

-Line 11(a)(i), Column A, of the Detailed Summary Page discloses \$320,370 in receipts. Schedule A supporting Line 11(a)(i) itemizes \$335,727 in receipts. These figures should be the same. Please amend your report to explain the difference. (11 CFR §104.3(a)) Please note, it does not appear that you have included your in-kind contributions in the total of Line 11(a).

-A review of your itemized receipts indicates a possible discrepancy in your aggregate year-to-date totals. The reported aggregate totals on your report should include all contributions from an individual or committee for the current calendar year (January 1, 1989 - Present). Please review your procedures for compliance with this requirement and amend any report(s) as necessary.

-Debt payments for this period (Schedule D) are greater than the payments itemized on Schedule B. Each expenditure to a person which in the aggregate is greater than \$200 for the year must be reported on Schedule B. "Person" includes an individual, partnership, corporation, association, and public or private organization -- other than an agency of the United States Government. Please explain the discrepancies in the payments made to Illeana Ros-Lehtinen. (11 CFR §§104.3(b)(4)(i)(A) and 100.10)

[-Schedule A of your report indicates that your committee may have failed to file one or more of the required 48]

CT

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hour notices regarding "last minute" contributions received by your committee after the close of books for the 12 Day Pre-General report. A principal campaign committee must notify the Commission, in writing, within 48 hours of any contribution of \$1,000 or more received between two and twenty days before an election. These contributions are then reported on the next report required to be filed by the committee. To ensure that the Commission is notified of last minute contributions of \$1,000 or more to your campaign, it is recommended that you review your procedures for checking contributions received during the aforementioned time period. Although the Commission may take legal action, any response you wish to make concerning this matter will be taken into consideration. (11 CFR §104.5(f))

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-For future reports, please be advised that contributions from individuals and political committees should be itemized on separate Schedules A. Additionally, the total amount of these contributions should be reported on the appropriate line of the Detailed Summary Page (11(a), 11(b) and 11(c)). Please note that transfers-in from Authorized Committees should be included in the total of Line 12, not Line 11(b).

-For future reports, please be advised that you should provide the complete name of any political committee that has contributed to your committee. Reporting only the name of the connected organization is not adequate.

A written response or an amendment to your original report(s) correcting the above problem(s) should be filed with the Clerk of the House of Representatives, 1036 Longworth House Office Building, Washington, DC 20515 within fifteen (15) days of the date of this letter. If you need assistance, please feel free to contact me on our toll-free number, (800) 424-9530. My local number is (202) 376-2480.

Sincerely,

Linda Tangney

Linda Tangney
Reports Analyst
Reports Analysis Division

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MEMORANDUM FOR FILES: TELECON

SUBJECT: Missing 48 hour notices

FROM: Richard Tonkinson

TO: Linda Tangney

NAME OF COMMITTEE: Ros-Lehtinen for Congress (FL)

DATE: 12/7/89

Mr. Tonkinson telephoned to inquire about the missing 48 hour notices. I explained to Mr. Tonkinson that the majority of the missing 48 hour notices appeared to be for the contributions received on August 25, 1989. Mr. Tonkinson stated that he would look into it.

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Delivered

DEC 1 PM 2 26

89 DEC 11 AM 10 56

HAND DELIVERED

December 7, 1989

131202

Linda Tangney
Reports Analyst
Reports Analyst Division
Federal Election Commission
Washington D.C. 20463

Reference : Ileana Ros Lehtinen for Congress
C00236976

Dear Linda :

In response to your letter of November 7, 1989 and our conversation of December 7, 1989, I am writing to reply to your review of the 30 day post-special report.

I have rechecked the line 11 (a) 1 column A for receipts and the correct total should be \$335,727. I forgot to add in the in kind contributions which are listed on pages 130 and 131 of schedule A. Thank you for bringing this to my attention.

Ileana Ros Lehtinen made a \$39,000 loan to the campaign. I posted the repayment of this loan on schedule D and did not post the repayment in schedule B because I did not post it in schedule A either. I did not consider it a contribution but a loan to be repaid. Specifically, Ileana was repaid in the following manner:

Bank : Sun Bank
Account number : 062001008394

<u>Check Number</u>	<u>Check Date</u>	<u>Amount</u>
1501	8 -23 -89	\$19,000
199310	8 -26 -89	\$10,000
1589	9 -11 -89	\$5,000
1619	10 -15 -89	\$5,000
	total	\$ 39,000

I am aware of the 48 hour notice regarding last minute contributions and understand that the the 48 hour report was not made for August 25,26,27,and 28.This was due to the severe intensity of the campaign in the final days where by collection of contributions and paying of vendors bills were the major priorities. The demand on the volunteers time in the finance area were such that the reports were not generated for the days mentioned. I apologise for this matter and the reelection campaign treasurer will do their best to adhere to this regulation. Ileana is considering using the services of a full time CPA firm for her reelection campaign in order to correct this situation.

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1989 Amended 30 Day Special Post General Report

As discussed the treasurer is a volunteer position and I work as a Trust Officer for Manufacturers Hanover Trust Company of Florida. I have been out of town from November 22 to December 1 for reasons of thanksgiving and bank business. I will be on vacation from December 13 to January 3 in California.

All the FEC form 3 reports and quarterly file on campaign receipts, checkbooks and correspondence are located in my home at 9841 S.W. 73 Court Miami, Florida 33156. There is no campaign material at the Congressional District office.

I wish you a Merry Christmas and a Happy New Year to you and I will be in contact with you when I return from my vacation.

Sincerely :

Richard Tonkinson

Richard Tonkinson

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NOV 17 1990-01

FEDERAL ELECTION COMMISSION
999 E Street, N.W.
Washington, D.C. 20463

SENSITIVE

FIRST GENERAL COUNSEL'S REPORT

RAD Referral 90L-6
STAFF MEMBER: George F. Rishel
Jeffrey D. Long

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

RESPONDENTS: Ileana Ros-Lehtinen for Congress
Committee and its treasurer¹

RELEVANT STATUTES: 2 U.S.C. § 433(c)
2 U.S.C. § 434(a)(6)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Disclosure Reports

FEDERAL AGENCIES CHECKED: None

I. GENERATION OF MATTER

This matter was referred to the Office of the General Counsel on March 2, 1990. The referral notes that the Ileana Ros-Lehtinen for Congress Committee failed to file 48-hour reports for 25 contributions totaling \$29,000 and that her campaign received excessive contributions totaling \$16,800 from four individuals and three party committees.²

The Ileana Ros-Lehtinen for Congress Committee ("the Ros-Lehtinen Committee") was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the

1. As discussed later, the former treasurer of record (Richard Preston Tonkinson) resigned effective December 31, 1989. Rep. Ros-Lehtinen signed the 1989 Year End Report as treasurer.

2. As explained later in the report, the amount of the excessive contributions should be adjusted to \$22,300.

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Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989. This referral also involves the Special Congressional Election Fund which began operation in July 1989 with the intention of eventually becoming an authorized committee of the candidate who won the special primary.³ See Attachment 2, pages 7-8. It became an authorized committee of Ileana Ros-Lehtinen on August 23, 1989, the date of the amended Statements of Candidacy and Organization. See Attachment 2, pages 3-4 and 9; Advisory Opinion 1977-16.

II. FACTUAL AND LEGAL ANALYSIS

The Ros-Lehtinen Committee raised \$1,053,638 and spent \$1,052,562 with respect to the 1989 special elections and ended the year with cash on hand of \$1,086 and no debts outstanding. It filed four reports covering the period from June 6, 1989, to December 31, 1989. For each of those reporting periods, the committee reported a surplus of cash on hand over outstanding debts. Thus, the reports indicate that the Committee did not have net debts outstanding from either the special primary election or the special general election. The committee has not yet terminated.⁴ The Special Congressional Election Fund raised

3. The treasurer of the Fund is Alberto R. Cardenas, who is also a state and executive committeeman of the Republican Party of Dade County and a respondent in MUR 3003 involving a complaint by the treasurer of the Republican Party of Dade County.

4. Rep. Ros-Lehtinen has registered a new principal campaign committee named Ileana Ros-Lehtinen for Congress-1990 for her re-election campaign in 1990. Through the end of 1989, it reported receipts of \$59,316, disbursements of \$13,911, with cash on hand of \$45,405 and no outstanding debts.

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and spent \$22,600 in 1989 and filed one report covering the period from July 14, 1989, to November 18, 1989, which was designated as a termination report.⁵ All of its receipts came from contributions from party committees or the principal campaign committees of Members of Congress, and its funds were all transferred to the Ros-Lehtinen Committee on August 7th and August 16th before Ms. Ros-Lehtinen designated it as an authorized committee.⁶

A. Failure to File 48-Hour Notifications

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that the principal campaign committee of a candidate shall file notifications of any contribution of \$1,000 or more received by any authorized committee after the 20th day but more than 48 hours before any election. This notification shall be made within 48 hours after the receipt of such contribution and shall include the name of the candidate and the office sought, the identification of the contributor, and the date of receipt and amount of the contribution. 2 U.S.C.

§ 434(a)(6)(A). This notification shall be in addition to all other reporting requirements under the Act. 2 U.S.C.

§ 434(a)(6)(B). The Act defines "identification" to mean in the

5. RAD has not yet informed the committee that its termination has been accepted.

6. By transferring all of its funds to the principal campaign committee, the Fund became an affiliated committee of the principal campaign committee pursuant to 11 C.F.R. § 110.3(a)(1)(iii)(E) and, thus, shared a single contribution limitation for contributions received by the two committees from the same contributor. This shared limit applied even if it had not later been designated an authorized committee.

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case of any individual, the name, the mailing address, and the occupation of each individual as well as the name of his or her employer and in the case of any other person, the full name and mailing address. 2 U.S.C. § 431(13).

A review of the reports filed by the Ros-Lehtinen Committee by the Reports Analysis Division has identified 25 contributions totaling \$29,000 that were received between the 20th day but more than 48 hours prior to the special general election.⁷ A listing of these contributions is set out in Chart B of the RAD referral materials, Attachment 1, page 7. These contributions were received on the following dates and in the indicated aggregate amounts on those dates:

Date Received	Aggregate Amount
August 11th	\$7,000
August 16th	4,000
August 17th	2,000
August 21st	1,000
August 25th	15,000
Total	\$29,000

These contributions were not reported within 48 hours as required by Section 434(a)(6).

Therefore, there is reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer violated 2 U.S.C. § 434(a)(6).

B. Receipt of Excessive Contributions

The Act provides that any person may contribute an aggregate

7. The committee also failed to file 48-hour notifications for contributions received prior to the special primary. These are not included since they did not meet the referral threshold for the special primary election.

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of \$1,000 with respect to any election to a candidate for federal office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441(a)(2)(A). A political committee may not knowingly accept a contribution in excess of these limitations. 2 U.S.C. § 441a(f). Commission regulations explain that an undesignated contribution is considered as made with respect to the next election. A designated contribution is considered made for the election designated, unless it is made after the designated election, in which case it can be made only if the campaign has net debts outstanding from the earlier election. 11 C.F.R. §§ 110.1(b) and 110.2(b)(3). The regulations also define net debts outstanding and provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. Id. Commission reporting forms provide for committees that make or receive contributions to indicate the election for which each contribution is made or received. See 11 C.F.R. § 104.2.

A review of the reports of the principal and authorized campaign committees by RAD has identified four individuals and three multicandidate political party committees who made excessive contributions to the campaign. These contributions are set out in Chart A of the RAD referral materials. Attachment 1, page 6. In the case of the individual contributors, the contributor made contributions after the special primary election and before the special general election that in the aggregate

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exceeded the contributor's limitation with respect to the special general election. As previously noted, the reports filed by the principal campaign committee indicate that the campaign was in a surplus position after the special primary election and, thus, did not have net debts outstanding with respect to that election. Thus, these contributions would remain excessive whether or not they were designated or redesignated for the earlier special primary election. See 11 C.F.R. §§ 110.1(b)(3) and 110.2(b)(3).

The three multicandidate political party committee contributions were made by the Republican Party of Florida, the National Republican Congressional Committee ("NRCC"), and the Republican National Committee ("RNC") and require further discussion. The Ros-Lehtinen Committee and the Special Congressional Election Fund reported all of them as made for the general election, thus resulting in this referral.

The reports filed by the Republican Party of Florida designated its August 9th \$5,000 contribution as made for the special primary election and an August 7th \$4,500 contribution for the special general election (they were reported as received on the 9th and 11th respectively). See Attachment 2, page 18. The special primary election contribution, however, was made after the August 1, 1989, special primary, and the Ros-Lehtinen Committee's reports indicate that it did not have net debts outstanding with respect to the special primary. Therefore, this contribution would appear excessive. In addition, the Ros-Lehtinen Committee also received a \$5,000 contribution from the Republican Party of Dade County on August 11, 1989. See

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Attachment 2, page 5. Under Commission regulations, all contributions made by a state party committee and all subordinate state party committees, including local county committees, are presumed made by one committee. 11 C.F.R. § 110.3(b)(2)(ii). This presumption, however, is rebuttable. Nevertheless, in the absence of evidence to rebut the presumption, the amount of the contribution by the Republican Party of Dade County should be added to those by the Republican Party of Florida, resulting in the receipt of an aggregate excessive contribution of \$9,500.⁸

The National Republican Congressional Committee reports making a July 29th \$5,000 contribution as designated for the special primary to the Special Congressional Election Fund and a

8. In the period from July 1, 1989, to September 18, 1989, the Republican Party of Dade County had total receipts of \$8,745 of which \$7,000 was reported as a contribution from the RNC. In addition to the \$5,000 direct contribution to the Ros-Lehtinen Committee, the Republican Party of Dade County also made \$4,747.74 in coordinated party expenditures pursuant to 2 U.S.C. § 441a(d) on August 25th on behalf of Ileana Ros-Lehtinen. In a February 19, 1990, letter to RAD, the treasurer of the Republican Party of Dade County stated that it had been authorized by the RNC to make the coordinated expenditures and had received the \$7,000 for that purpose. The Republican Party of Dade County also reported making \$8,820.00 in GOTV disbursements on August 24th and 25th. In the same February 19, 1990, letter, the treasurer stated that the radio spots "were not made on behalf of any specific candidate." He said that there was a special state election at the same time as the special federal election and that the ads were designed to encourage Republicans to vote. He said the federal account was used to pay for them because of the special federal election and because that's where the money was. These circumstances indicate that there may be additional excessive contributions depending upon the validity of the coordinated party expenditures and the exempt payments. Although we note that these expenditures are also the subject of the treasurer's complaint in MUR 3003, the proposed questions seek to clarify these disbursements as they may relate to the Ros-Lehtinen Committee.

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August 3rd \$4,500 contribution to the Ros-Lehtinen Committee.⁹ See Attachment 2, pages 10-12. At the time it made this contribution to the Fund, the Fund had not yet been designated as an authorized committee, though it had indicated in filing its Statement of Organization with the Commission that it intended to become one after the nominee was chosen. The Fund was not designated by Ms. Ros-Lehtinen as an authorized committee until August 23rd. It reported receiving the July 29th contribution on August 8th.¹⁰ Commission regulations provide that a contribution is made either when delivered to the candidate or the candidate's agent or, if mailed, on the date of the postmark. 11 C.F.R. § 110.2(b)(6). The information at this point is not clear on whether the contribution was mailed on or before August 1st or whether it was delivered in some other manner and, if so, on what date. Nevertheless, the date of the making of the contribution to the Fund is not determinative. As noted, the Fund was set up to raise funds for the eventual nominee. See Attachment 2, page 7. Therefore, in this Office's opinion, all contributions to the

9. The NRCC also reported making in-kind contributions of \$62.10 for mailing service and \$437.90 for telemarketing on behalf of the Ros-Lehtinen Committee with respect to the special general election. The Ros-Lehtinen Committee reported the receipt of this \$500 contribution, but it was itemized among the in-kind contributions from individuals. See Attachment 2, pages 6 and 13. Therefore, the total excessive contribution from NRCC should be adjusted to \$5,000.

10. These dates are somewhat confusing and may be incorrect. The Fund reported transferring \$19,000 of its \$22,600 to the Ros-Lehtinen Committee on August 7th, but reports all receipts, including \$15,000 from three national party committees, with the date of August 8th. The Fund may have been reporting the date of deposit rather than the date of receipt as required by the regulations at 11 C.F.R. § 104.3(a)(4)(i).

Fund should be treated as made for the general election and should have been so reported by the NRCC.¹¹

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The Republican National Committee also made a contribution of \$5,000 to the Special Congressional Election Fund on July 26th, six days before the primary, but it did not indicate any designation on its reports. The Fund reported receiving it on August 8th. The fund's transfers to the Ros-Lehtinen Committee were made on August 7th (\$19,000) and August 16th (\$3,600). The RNC also made an August 3rd \$5,000 contribution to the Ros-Lehtinen Committee with respect to the special general election which the committee reported receiving on August 7th. See Attachment 2, pages 14-15. As with the NRCC contribution, the date of the making of the contribution to the Fund is not determinative. In this Office's opinion, all contributions to the Fund should be treated as made with respect to the general election and should have been so reported by the RNC. On March 15, 1990, the RNC amended its reports to clarify that the contribution to the Fund was for the general election and that the August 3rd contribution to the Ros-Lehtinen Committee was for

11. The NRCC reported making a total of \$47,836 in coordinated party expenditures on behalf of Ileana Ros-Lehtinen in addition to the \$4,747 in coordinated party expenditures made by the Republican Party of Dade County, with the alleged authorization of the RNC. The coordinated party expenditure limitation for the 1989 special elections was \$23,990 each for the Republican Party of Florida and the RNC. Thus, the aggregate amount of reported coordinated party expenditures of \$52,583 exceeds the aggregate limitations by \$4,603. According to RAD, however, under the circumstances here, neither the NRCC nor the Republican Party of Dade County is referable. Therefore, although no recommendation is made with respect to these committees and 2 U.S.C. § 441a(d), the proposed questions seek to clarify these expenditures.

primary debt retirement. See Attachment 2, pages 27-34. As noted, there is no indication that the Ros-Lehtinen Committee had net debts outstanding from the primary election. Thus, this contribution should be treated as made with respect to the general election.

Thus, the total amount of excessive contributions is \$22,300 rather than \$16,800. It is computed as follows:

Four Individuals	\$2,800
Republican Party of Florida (including Dade County)	9,500
NRCC	5,000
RNC	5,000
Total	<u>\$22,300</u>

Although two of these excessive contributions were made to the Special Congressional Election Fund rather than the principal campaign committee, this Office concludes that all three contributions should be included in the finding made with respect to the principal campaign committee. The Ros-Lehtinen Committee had a responsibility to ascertain the source of monies held by the Fund at the time of the transfer. Thus, once the candidate designated the Fund as an authorized committee and the Fund transferred all of its funds to the Ros-Lehtinen Committee, the Ros-Lehtinen Committee had, in effect, knowingly accepted excessive contributions. See Advisory Opinion 1977-16.

Therefore, there is reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer violated 2 U.S.C.

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§ 441a(f).¹² There is also reason to believe the Republican National Committee and William J. McManus, as treasurer; the National Republican Congressional Committee and Jack McDonald, as treasurer; the Republican Party of Florida and Shirlee Bowne, as treasurer, and the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a. Although these committees are not separately referable under the present referral thresholds, this Office concludes that they should be made respondents in this matter based on the treatment of the contributions to the Fund as made for the general election with respect to the RNC and NRCC and the application of the presumption of affiliation criteria with respect to the Republican Party of Florida and the Republican Party of Dade County. These excessives also arise because it appears that the Ros-Lehtinen Committee did not have net debts outstanding from the primary election. This treatment will also permit resolution of the questions regarding the coordinated party expenditures and the exempt payments by the Republican Party of Dade County.

The RAD referral materials contain copies of letters that the former treasurer wrote to the individuals and committees who made apparent excessive contributions.¹³ See Attachment 1, pages 29-35. There are portions of these letters that require

12.

13. As of March 20, 1990, the Commission had not received any redesignations or reattributions of these contributions. Thus, these letters do not affect the recommendations.

additional comment. First, the letters to the individuals request written permission to consider the excessive portion of the contribution as a contribution from a spouse or relative, who is over 21 years old, and to provide a statement that the funds are the spouse's or relative's and not a gift from the contributor. Because the contributor presumably used his or her own funds to make the initial contribution, the committee appears to be asking that the contributor make the contribution in the name of another person, which is prohibited by 2 U.S.C. § 441f. Second, all of the letters ask for written permission to treat the contribution as for debt retirement or for the re-election campaign. As noted, the committee's reports indicate that it did not have net debts outstanding at the time these contributions were received and did not end the election cycle for the special election with debts outstanding. Therefore, it does not appear possible that the excessive portions of these contributions can be allocated to debt retirement. We further note that contributions made to retire debts are still subject to the contribution limitations for the election to which the debts are attributed. See 11 C.F.R. §§ 110.1(g) and 110.2(g); Advisory Opinions 1989-22, 1989-15, and 1989-10. Furthermore, the reports show that the authorized committees expended all but \$1,086 of their receipts with respect to the special elections. Since the excessive portions of these contributions have already been expended in an earlier election, they cannot be attributed to the 1990 re-election campaign. Therefore, the suggestions made to the contributors as methods to correct the excessive

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contributions are incorrect and erroneous in all respects. See Advisory Opinion 1989-15.

C. Failure to Notify Commission of Treasurer Change

The Act also provides that every committee shall have a treasurer and that no contributions or expenditure shall be accepted or made during any period in which the office of treasurer is vacant. 2 U.S.C. § 432(a). The Act further requires each political committee to identify the name and address of its treasurer on its Statement of Organization and to notify the Commission of any change of information on its statement within 10 days of such change. 2 U.S.C. §§ 433(b)(4) and 433(c). Commission regulations explain that notice of any change may be made by filing an amended Statement of Organization or by filing a letter noting the change. 11 C.F.R. § 102.2(a)(2).

In a letter to the reports analyst, dated January 24, 1990, Richard Preston Tonkinson, the former treasurer of record for the principal campaign committee, stated that he was no longer the treasurer of the committee, having resigned effective December 31, 1989. He added that he informed Rep. Ros-Lehtinen of his resignation on January 6, 1990, and understood "that she is in the process of finding a replacement." See Attachment 1, pages 27-28. To date, no filing has been made with the Commission noting a new treasurer for the committee. Rep. Ros-Lehtinen signed the 1989 Year End Report.

Therefore, there is reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer violated 2 U.S.C.

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§ 433(c).

III. RECOMMENDATIONS

1. Open a MUR.
2. Find reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer violated 2 U.S.C. §§ 433(c), 434(a)(6), and 441a(f).
3. Find reason to believe the Republican National Committee and William J. McManus, as treasurer; the National Republican Congressional Committee and Jack McDonald, as treasurer; the Republican Party of Florida and Shirlee Bowne, as treasurer; and the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.
4. Approve the attached letters, Factual and Legal Analyses, and Interrogatories and Request for Documents to the Respondents.

Lawrence M. Noble
General Counsel

Date

4/16/90

BY:


Lois G. Lerner
Associate General Counsel

Attachments:

1. Referral Materials
2. Addition excerpts from reports and filings
3. Proposed Letters, Factual and Legal Analyses, and Interrogatories and Request for Documents to the Respondents(5)

14. In the absence of a current treasurer, the proposed notice of these finding is addressed to Rep. Ros-Lehtinen. The Ros-Lehtinen Committee's new address is the same as the one for the 1990 re-election committee.

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FEDERAL ELECTION COMMISSION
1989-1990

DATE 04/19/90

CANDIDATE INDEX OF SUPPORTING DOCUMENTS -

PAGE 1

CANDIDATE/COMMITTEE/DOCUMENT	OFFICE SOUGHT/	PARTY	RECEIPTS		DISBURSEMENTS		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
			PRIMARY	GENERAL	PRIMARY	GENERAL			
ROS-LEHTINEN, ILEANA	HOUSE 18	REPUBLICAN PARTY					1990 ELECTION	ID# H0FL18025	
1. STATEMENT OF CANDIDATE									
1989 STATEMENT OF CANDIDATE							19JUN89	1 89HSE/379/22	
STATEMENT OF CANDIDATE - AMENDMENT							25AUG89	1 89HSE/384/261	
STATEMENT OF CANDIDATE							16NOV89	1 89HSE/386/017	
2. PRINCIPAL CAMPAIGN COMMITTEE									
ILEANA ROS-LEHTINEN FOR CONGRESS - 1990							ID #C00239731	HOUSE	
1989 STATEMENT OF ORGANIZATION							24OCT89	1 89HSE/385/406	
YEAR-END			59,316		13,911		30SEP89 -31DEC89	27 90HSE/389/186	
1990 STATEMENT OF ORGANIZATION - AMENDMENT							12FEB90	1 90HSE/392/00X	
STATEMENT OF ORGANIZATION - AMENDMENT							14FEB90	1 90HSE/392/01E	
TOTAL			59,316	0	13,911	0		30 TOTAL PAGES	
3. AUTHORIZED COMMITTEES									
ILEANA ROS-LEHTINEN FOR CONGRESS							ID #C00236976	HOUSE	
1989 STATEMENT OF ORGANIZATION							19JUN89	1 89HSE/379/22	
48 HOUR CONTRIBUTION NOTICE							25JUL89	3 89HSE/380/30X	
48 HOUR CONTRIBUTION NOTICE							28JUL89	2 89HSE/380/401	
48 HOUR CONTRIBUTION NOTICE							31JUL89	3 89HSE/381/36X	
48 HOUR CONTRIBUTION NOTICE							1AUG89	2 89HSE/382/19X	
48 HOUR CONTRIBUTION NOTICE							1AUG89	2 89HSE/382/06X	
48 HOUR CONTRIBUTION NOTICE							4AUG89	2 89HSE/383/40X	
48 HOUR CONTRIBUTION NOTICE							14AUG89	3 89HSE/384/09X	
48 HOUR CONTRIBUTION NOTICE							16AUG89	3 89HSE/384/11X	
48 HOUR CONTRIBUTION NOTICE							21AUG89	3 89HSE/384/21X	
48 HOUR CONTRIBUTION NOTICE							23AUG89	2 89HSE/384/24X	
48 HOUR CONTRIBUTION NOTICE							23AUG89	2 89HSE/384/26X	
STATEMENT OF ORGANIZATION - AMENDMENT							25AUG89	1 89HSE/384/26X	
48 HOUR CONTRIBUTION NOTICE							25AUG89	2 89HSE/384/25X	
48 HOUR CONTRIBUTION NOTICE							25AUG89	3 89HSE/384/26X	
PRE-SPECIAL			201,813		135,175		6JUN89 -14JUL89	102 89HSE/380/09X	
PRE-SPECIAL - AMENDMENT							- 6JUN89 -14JUL89	10 89HSE/380/300	
PRE-SPECIAL - AMENDMENT							- 6JUN89 -14JUL89	1 90FEC/628/02X	
REQUEST FOR ADDITIONAL INFORMATION							6JUN89 -14JUL89	5 89FEC/607/10X	
REQUEST FOR ADDITIONAL INFORMATION							6JUN89 -14JUL89	5 89FEC/607/10X	
REQUEST FOR ADDITIONAL INFORMATION 2ND							1JUN89 -14JUL89	5 89FEC/609/02X	
REQUEST FOR ADDITIONAL INFORMATION 2ND							6JUN89 -14JUL89	5 89FEC/609/02X	
REQUEST FOR ADDITIONAL INFORMATION							15JUL89 -26JUL89	2 89FEC/609/16X	
REQUEST FOR ADDITIONAL INFORMATION							15JUL89 -26JUL89	2 89FEC/609/16X	
REQUEST FOR ADDITIONAL INFORMATION 2ND							15JUL89 -26JUL89	5 89FEC/611/09X	
REQUEST FOR ADDITIONAL INFORMATION 2ND							15JUL89 -26JUL89	5 89FEC/611/09X	
PRE-RUN-OFF			169,843		170,368		15JUL89 -26JUL89	137 89HSE/383/43	
PRE-RUN-OFF - AMENDMENT			170,357		170,368		15JUL89 -26JUL89	16 89HSE/384/04	
PRE-RUN-OFF - AMENDMENT							-15JUL89 -26JUL89	1 90FEC/628/02X	

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HAND DELIVERED

STATEMENT OF CANDIDACY

(see reverse side for instructions)

PAGE 1 OF 2
800 MS 25 FN 3 40

U.S. HOUSE OF REPRESENTATIVES

1. Name of Candidate Iilvena Ros-Lehtinen 2. Address (number and street) 1712 S.W. 10th Street 3. City, State and ZIP Code Miami, Florida 33155		<input type="checkbox"/> Check if address changed
4. Party Affiliation Republican		5. State & District of Candidate FL-18
6. Office Sought U.S. House of Rep.		7. Identification Number C00386976 CCFUE 0989

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

I hereby designate the following named political committee as my Principal Campaign Committee for the 1992 election(s) (year of election)

NOTE: This designation should be filed with the appropriate office listed below.

(a) Name of Committee (in full)

Iilvena Ros-Lehtinen for Congress

(b) Address (number and street)

401 Miracle Mile - Suite 107

(c) City, State and ZIP Code

Coral Gables, Florida 33134

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)

The Special Congressional Election Fund

(b) Address (number and street)

1221 Brickell Avenue - 22nd Floor

(c) City, State and ZIP Code

Miami, Florida 33131

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

Signature of Candidate

Iilvena Ros-Lehtinen

Date

8/23/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. (437).

CANDIDATES FOR THE OFFICE OF:

President mail to:

Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

U.S. Senate mail to:

Secretary of the Senate
Office of Public Records
232 Hart Senate Office Bldg.
Washington, DC 20510-7110

U.S. House of Representatives mail to:

Clerk of the House of Representatives
Office of Records and Registration
1038 Longworth Office Bldg.
Washington, DC 20515-0812

For further information contact:

Federal Election Commission
Toll-free 800/424-6530
Local 202/376-3120

FEC FORM 2
(revised 4-87)

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 2
FOR LINE NUMBER 116

POLITICAL PARTY COMMITTEE

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

203 - Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
1st Form 2 Republican Party 203 W Magnolia Blvd Burbank, Calif. 91506 Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Occupation Aggregate Year-to-Date > \$ 5,000	8-28-89	\$ 5,000.00
B. Full Name, Mailing Address and ZIP Code Michigan Republican State Comm. 2121 E Grand River Lansing, Michigan 48912 Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Occupation Aggregate Year-to-Date > \$ 5,000	8-28-89	\$ 5,000.00
C. Full Name, Mailing Address and ZIP Code South Carolina Republican Party P.O. Box 21765 Columbia, So Carolina 29221 Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Occupation Aggregate Year-to-Date > \$ 2,000	8-28-89	\$ 2,000.00
D. Full Name, Mailing Address and ZIP Code Republican Majority Fund 503 Capitol Court NE Ste 100 Washington D.C. 20002 Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input type="checkbox"/> General	Name of Employer Occupation Aggregate Year-to-Date > \$ 2,000	8-28-89	\$ 2,000.00
E. Full Name, Mailing Address and ZIP Code Miss. pp. Republican Party P.O. Box 1178 Jackson, Miss. 39205 Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Occupation Aggregate Year-to-Date > \$ 3,000	8-28-89	\$ 3,000.00
F. Full Name, Mailing Address and ZIP Code Victory 88 Committee 315 State Street Albany, New York 12210 Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Occupation Aggregate Year-to-Date > \$ 5,000	8-29-89	\$ 5,000.00
G. Full Name, Mailing Address and ZIP Code Republican Party of Dade County 1890 W 49 Street Miraleah FL 33012 - 2948 Receipt For: <input type="checkbox"/> Other (specify) <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General	Name of Employer Occupation Aggregate Year-to-Date > \$ 5,000	8-11-89	\$ 5,000.00

SUBTOTAL of Receipts This Page (optional) \$27,000
 TOTAL This Period (last page this line number only)

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ITEMIZED RECEIPTS

Use separate sheets for each category of the receipt on a separate page

PAGE 131 OF 131
FOR LINE NUMBER 11A1

IN KIND CONTRIBUTION

Receipts from such Reports and Statements may not be used or used by any person for the purpose of tax-exempt contributions or for commercial purposes. Also, do not use the name and address of any political committee to solicit contributions from such committee.

RECIPIENT COMMITTEE (in Full)

Ileana Rios-Lehtinen for Congress

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Luis Alvarez 9800 NW 25 Street Suite 205 MIAMI, FL 33137	Sentrex Security	9-10-89	\$200.00 Security
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > 8	
B. Full Name, Mailing Address and ZIP Code Joe Toledo 2721 West 81st. Hialeah, FL 33016	Dolphin Ice	9-10-89	\$200.00 ice
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > 8	
C. Full Name, Mailing Address and ZIP Code Mrs. Millie Porcino 2472 NW 21 Terrace MIAMI, FL 33142	Construction Catering	9-10-89	\$620.00 Food
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > 8	
D. Full Name, Mailing Address and ZIP Code NATIONAL REPUBLICAN CONGRESSIONAL Committee 320 1ST STREET S.E. WASHINGTON D.C. 20003	Congressional Committee	8-29-89	\$500.00 Telephone
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > 8	
E. Full Name, Mailing Address and ZIP Code Robin Kaskel 5881 SW 105 Street MIAMI, FL 33156	housewife	8-30-89	\$1000.00 Food
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > 8	
F. Full Name, Mailing Address and ZIP Code Mrs. Irela Samat 445 NW 12 Street MIAMI, FL 33166	Kaufman and Roberts Executive	8-28-89	\$569.00 TV + VCR
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > 8	
G. Full Name, Mailing Address and ZIP Code BI PAC 1747 Pennsylvania Ave. N.W. Washington		8-25-89	\$251.32 LISTS
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	Occupation	Aggregate Year-to-Date > 8	

SUBTOTAL of Receipts This Page (optional) \$3340.32

TOTAL This Period (last page this no number only)

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1989 JUL 14 PM 2 56

THE SPECIAL CONGRESSIONAL ELECTION FUND

171966

July 13, 1989

Clerk of the House
U.S. House of Representatives
Office of Records and Registration
1036 Longworth House Office Building
Washington, D.C. 20515

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20004

Re: Statement Of Organization -- The Special
Congressional Election Fund

Gentlemen:

The purpose of this letter is to advise you that the enclosed Statement Of Organization for the Election Fund is being filed pursuant to Federal Election Commission Advisory Opinion 1977-16 issued by the Commission on July 29, 1977.

As such, the Congressional Election Fund's Statement Of Organization establishes the Committee as a "political committee" under the Federal Election Campaign Act and will operate as if it is an "authorized committee" pursuant to the above-mentioned FEC Advisory Opinion.

Once the selected candidate retroactively designates the Congressional Election Fund as his principal campaign committee, we will file the required amended Statement Of Organization and Statement Of Candidacy appropriately designating the Committee.

Sincerely,

Treasurer

007013794461

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HAND DELIVERED

STATEMENT OF ORGANIZATION

FEDERAL ELECTION COMMISSION JUL 14 PM 2:54

(See reverse side for instructions)

1. NAME OF COMMITTEE OR FUND (Check if name is changed)
 National Congressional Election Fund
 2. STREET ADDRESS (Check if address is changed)
 1221 Brickell- 22nd Floor
 3. CITY AND ZIP CODE
 Miami, Florida 33131

4. DATE
 JULY 14, 1989
 5. FEC IDENTIFICATION NUMBER
 To Be Assigned 131466
 6. IS THIS STATEMENT AN AMENDMENT?
 YES NO

7. TYPE OF COMMITTEE (Check one)

- This committee is a principal campaign committee. (Complete the candidate information below.)
- This committee is an authorized committee and is NOT a principal campaign committee. (Complete the candidate information below.)
- Name of Candidate _____ Candidate Party Affiliation _____ Office Sought _____ State-District _____
- This committee supports/opposes only one candidate _____ name of candidate _____ and is NOT an authorized committee.
- This committee is a _____ committee of the _____ Party (National, State, or subordinate) (Democrat, Republican, etc.)
- This committee is a separate segregated fund.
- This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

8. Type of Connected Organization

Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

9. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name: Alberto R. Cardenas Mailing Address: 22nd Floor, 1221 Brickell Avenue, Miami, Florida 33131 Title or Position: Treasurer

10. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name: Alberto R. Cardenas Mailing Address: 22nd Floor, 1221 Brickell Avenue, Miami, Florida 33131 Title or Position: Treasurer

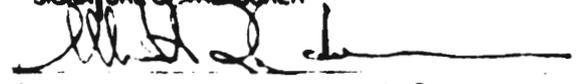
11. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.: Capital Bank Mailing Address and ZIP Code: 1221 Brickell Avenue, Miami, FL 33131

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

TYPE OR PRINT NAME OF TREASURER
 Alberto R. Cardenas

SIGNATURE OF TREASURER



DATE
 7-13-89

The submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437c. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact
 Federal Election Commission
 Toll-free 800-424-9630
 Local 202 378-3120

FEC FORM 1
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HAND DELIVERED

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

FORM NO. 25 FEB 3 69

1. NAME OF COMMITTEE OR FUND (Check if new or changed)
 National Congressional Election Fund

2. Mailing and Street Address (Check if address is changed)
 1221 Brickell Avenue - 22nd Floor

3. City, State and ZIP Code
 Miami, Florida 33131

4. COUNTY OF THE STATE (Check if changed)
 131911

5. TYPE OF COMMITTEE (Check one)
- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
 - X (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | Name of Candidate | Candidate Party Affiliation | Office Sought | State/Class |
|----------------------|-----------------------------|---------------|-------------|
| Pieteri Kos-Lahtinen | Republican | U.S. House | FL-18 |
- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee. (name of candidate)
 - (d) This committee is a _____ committee of the _____ Party. (National, State or subordinate) (Democratic, Republican, etc.)
 - (e) This committee is a separate segregated fund.
 - (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

6. Type of Connected Organization
 Corporation Corporation w/o Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Alberto R. Cardenas	1221 Brickell Avenue-22nd Floor Miami, Florida 33131	Treasurer

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Alberto R. Cardenas	1221 Brickell Avenue-22nd Floor Miami, Florida 33131	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Capital Bank	1221 Brickell Avenue Miami, Florida 33131

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

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
Alberto R. Cardenas		8/23/69

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
 Federal Election Commission
 Toll-free 800-426-6830
 Local 202-576-3120

FEC FORM 1
 (revised 4/6)

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ANY INFORMATION COPIED FROM SUCH REPORTS OR STATEMENTS ARE NOT TO BE SOLD OR USED BY ANY PERSON FOR THE PURPOSE OF SOLICITING CONTRIBUTIONS OR FOR COMMERCIAL PURPOSES, OTHER THAN USING THE NAME AND ADDRESS OF ANY POLITICAL COMMITTEE TO SOLICIT CONTRIBUTIONS FROM SUCH PERSONS.

NAME OF COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

A. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
BENTWILL FOR CONGRESS TREAS: CONNIE BIRD 1427 MCHEERY AVE. ROCKFORD, CA 95350	CA / 15 PRIMARY CONTRIB	8/17/89	15000.00
DISBURSEMENT FOR: SPECIAL PRIMARY			YTD TOTAL: 15000.00
B. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
LANIER FOR CONGRESS TREAS: HON. ROY ENGLISH 910 HOUSTON SUITE 700 FT. WORTH, TX 76102	TX / 12 RUN OFF CONTRIB	8/18/89	14000.00
DISBURSEMENT FOR: SPECIAL RUN-OFF			YTD TOTAL: 14000.00
C. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
ZALAMA ROS-LENTZNER FOR CONGRESS 402 MIRACLE HILE, #107 CORAL GABLES, FL 33134	FL / 16 GENL CONTRIB.	8/18/89	14000.00
DISBURSEMENT FOR: SPECIAL GENERAL			YTD TOTAL: 14000.00

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NAME OF COMMITTEE: NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE - EXPENDITURES

A. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
LEHIGH VALLEY CITIZENS FOR DON RITTER 2 BETHLEHEM PLAZA BETHLEHEM, PA 18016	PA / 15 MEDIA SERVICES	8/02/89	832.10
DISBURSEMENT FOR: PRIMARY			
YTD TOTAL			8486.40

B. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
TOMMY ROBINSON RE-ELECTION CAMPAIGN COMMITTEE 1927 FEDERAL BUILDING LITTLE ROCK, AR 72201	AR / 02 MEDIA SERVICES	8/02/89	8426.50
	AR / 02 MEDIA SERVICE	8/02/89	8100.00
DISBURSEMENT FOR: PRIMARY			
YTD TOTAL			8604.50

C. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
ILEANA ROS-LENTINEN FOR CONGRESS 401 MIRACLE HILL, 0107 CORAL GABLES, FL 33134	FL / 10 TELEMARKETING SERVICE	8/24/89	862.10
	FL / 10 TELEMARKETING	8/28/89	8437.90
DISBURSEMENT FOR: SPECIAL GENERAL			
YTD TOTAL			85000.00

D. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
T. ROTH FOR CONGRESS '90 P.O. BOX 2673 APPLETON, WI 54913	WI / 00 MEDIA SERVICES	8/02/89	8109.50
	WI / 00 MEDIA SERVICES	8/02/89	832.00
	WI / 00 MEDIA SERVICES	8/22/89	86.00
DISBURSEMENT FOR: PRIMARY			
YTD TOTAL			8409.50

E. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
ROWLAND FOR CONGRESS COMMITTEE P.O. BOX 444 WATERBURY, CT 06720	CT / 05 MEDIA SERVICES	8/01/89	820.00
	CT / 05 MEDIA SERVICES	8/02/89	822.00
	CT / 05 MEDIA SERVICES	8/02/89	816.00
DISBURSEMENT FOR: PRIMARY			
YTD TOTAL			8248.00

F. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
SCHIFF FOR CONGRESS TREAS: GEORGE GRAMM P.O. BOX 25189 ALBUQUERQUE, NM 87125	NM / 01 MEDIA SERVICES	8/02/89	812.00
DISBURSEMENT FOR: PRIMARY			
YTD TOTAL			84220.37

G. FULL NAME & ADDRESS:	PURPOSE OF DISBURSEMENT:	DATE	AMOUNT
BILL SCHWETTE FOR CONGRESS 90 TREAS: GWEN LANG 135 ROAD, BOX 353 MIDLAND, MI 48640	MI / 10 MEDIA SERVICES	8/04/89	810.00
	MI / 10 MEDIA SERVICES	8/05/89	870.00
	MI / 10 MEDIA SERVICES	8/14/89	870.00
DISBURSEMENT FOR: PRIMARY			
YTD TOTAL			8750.00

SUBTOTAL OF DISBURSEMENTS THIS PAGE 81486.00

PERIOD 07/01/00 TO 07/31/00
END DATE 08/02/00

REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES
ITORIZED CONTRIBUTION
SCHEDULE B LINE 21A

PAGE 1

1

NAME ADDRESS	PURPOSE OF EXPENDITURE	DATE	AMOUNT
808 LANIER FOR CONGRESS P.O. BOX 2116 NORTH TX 76115-0000	CONTRIBUTION TXND128 TEXAS 12TH DISTRICT SPECIAL	07/17/00	5,000.00
THE SPECIAL CONGRESSIONAL ELECTION FUND 1221 BRICKELL AVE. MIAMI FL 33131	CONTRIBUTION	07/20/00	5,000.00
TAYLOR FOR CONGRESS C/O CHARLES TAYLOR 8 SOUTH MARKET STREET ASHEVILLE NC 28801	CONTRIBUTION NCH011P N. CAROLINA 11TH DISTRICT PRIMARY	07/19/00	1,500.00
	PAGE TOTAL		11,500.00
	GRAND TOTAL		11,500.00

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08/23/89
08/29/89

REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES
IDENTIFIED DISBURSEMENT
SCHEDULE B LINE 21A

PAGE

NAME

PURPOSE OF EXPENDITURE

DATE

AMOUNT

BERRY HILL FOR CONGRESS
PO BOX 1506
MIRAGE, CA 95307

CONTRIBUTION CA00158
CALIFORNIA 15TH DISTRICT SPECIAL

08/23/89

5,000.00

W B LANIER FOR CONGRESS
PO BOX 2116
WORTH TX 76113-2116

CONTRIBUTION TX0012R
TEXAS 12TH DISTRICT RUN OFF

08/29/89

5,000.00

MEANA ROS-LEHTINEN / CONGRESS
201 MIRACLE HILLS #107
CORAL GABLES FL 33134

CONTRIBUTION FL0018P
FLORIDA 18TH DISTRICT PRIMARY

08/03/89

5,000.00

PAGE TOTAL
GRAND TOTAL

15,000.00
15,000.00

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COMMITTEE REPORTS AND DISBURSEMENTS

to be filed with the Applicable Committee
 (Summary Page)

RECEIVED
 FEDERAL ELECTION COMMISSION
 AUG 17 1989

09 AUG 17 MID 17

NAME OF COMMITTEE OR CANDIDATE Republican Party of Florida - National Committee Organization (Committee Number and Street) 11 North Calhoun Street TALLAHASSEE, Florida 32303	E. FEDERAL IDENTIFICATION NUMBER 0000829
F. STATE and ZIP CODE Tallahassee, Florida 32303	3. This committee qualified as a non-candidate committee <input type="checkbox"/> BEFORE THIS Reporting Period on _____ (Date)

4. TYPE OF REPORT:

April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On
 February 20
 March 20
 April 20
 May 20
 June 20
 July 20
 August 20
 September 20
 October 20
 November 20
 December 20
 January 31

Twelfth day report preceding General (Type of Election) election on 8/29/89 in the State of Florida

Thirtieth day report following the General Election on _____ in the State of _____

Is this Report an Amendment? YES NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
Covering Period <u>7/1/89</u> through <u>8/9/89</u>		
1. Cash on Hand January 1, 19 <u>89</u>		\$ <u>253,993.61</u>
2. Cash on Hand at Beginning of Reporting Period	\$ <u>382,819.15</u>	
3. Total Receipts (from Line 18)	\$ <u>228,402.38</u>	
4. Subtotal (add Lines 2, 3, and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ <u>611,221.73</u>	\$ <u>1,105,411.14</u>
5. Total Disbursements (from Line 28)	\$ <u>288,371.77</u>	\$ <u>782,241.90</u>
6. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ <u>322,849.96</u>	\$ <u>323,169.24</u>
7. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)	\$ <u>1,045.00</u>	
8. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D)	\$ _____	

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

Name or Print Name of Treasurer:
Julie Rowe
 Signature: *Julie Rowe*

For further information contact:
 Federal Election Commission
 999 E Street, N.W.
 Washington, D.C. 20543
 Toll Free 800-424-9541
 Local 202-418-6400

92040894798

STATE OF FLORIDA

DETAILED SUMMARY PAGE

of Receipts and Disbursements
Page 2 of 2

	Reporting Period	
REPUBLICAN PARTY OF FLORIDA - Federal Campaign Committee	From: 7/1/88	To: 8/31/88
I. RECEIPTS	COLUMN A Total From Party	COLUMN B Grand Total To Date
Receipts from U.S. other than (over) FROM:		
(a) Individuals (use Schedule A)	\$ 25,000.00	\$25,000.00
(b) Political Party Committees	10,000.00	67,000.00
(c) Other Political Committees (such as PACs)	1,000.00	78,000.00
(d) TOTAL CONTRIBUTIONS (add 11(a)(i), (b), and (c))	36,000.00	78,000.00
TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	62,000.00	78,000.00
LOAN RECEIPTS		
LOAN REPAYMENTS RECEIVED		
REFUNDS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
OTHER RECEIPTS (Dividends, Interest, etc.)	17,250.00	78,250.00
TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	228,000.00	251,900.00
II. DISBURSEMENTS		
OPERATING EXPENDITURES	100,144.80	197,128.83
TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES	175,726.97	576,221.97
CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	9,500.00	
NON-FEDERAL EXPENDITURES (use Schedule E)		
COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (20 U.S.C. 441a(d)) (use Schedule F)		
LOAN REPAYMENTS MADE		
LOANS MADE		
REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals, Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
OTHER DISBURSEMENTS		
TOTAL DISBURSEMENTS (add 10, 20, 21, 22, 23, 24, 25, 26(d), and 27)	288,371.77	
NET CONTRIBUTIONS OPERATING EXPENDITURES		

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SCHEDULE B

Any information reported from each primary and secondary election... (text is mostly illegible)

NAME OF CANDIDATE IN FULL
Republican Party of Florida - Federal Campaign Committee

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
401 Municipal Plaza, Suite 107 Coral Gables, FL 33134	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	8/27/87	4,000.00
401 Municipal Plaza, Suite 107 Coral Gables, Florida 33134	Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	7/15/87	2,000.00
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

TOTAL: 9,500.00

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REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

89 OCT -2 AM 11:12

USE FEC NUMBER LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (IN FULL)
REPUBLICAN PARTY OF DADE COUNTY
Check if different than previously reported

2. ADDRESS (Number and Street)
2905 SALZEDO

3. CITY, STATE AND ZIP CODE
CORAL GABLES, FL 33134

2. FEC IDENTIFICATION NUMBER
C00 187013

3. This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ date _____

4. TYPE OF REPORT

- 1. Monthly Report
- 2. Quarterly Report
- 3. Quarterly Report
- 4. Year-End Report
- 5. Year-End Report
- 6. Year-End Report (Non-election Year Only)
- 7. Twelfth day report preceding election on _____ in the State of _____
- 8. Twelfth day report following the General Election on **Aug 29, 89** in the State of **FLORIDA**

Monthly Report Due On		
February 20	June 20	October 15
March 20	July 20	November
April 20	August 20	December
May 20	September 20	January 15

9. Is this Report an Amendment? YES NO

SUMMARY

Reporting Period	COLUMN A This Period	COLUMN B Calendar Year-to-Date
July 1, 1989 through September 12, 1989 August 29, 1989		
Amount on Hand January 1, 1989		\$ 15,668.61
Amount on Hand at Beginning of Reporting Period	\$ 10,199.58	
Total Receipts from Line 18	\$ 8,745.00	\$ 9,948.14
Total Disbursements from Line 28	\$ 18,944.58	\$ 25,616.75
Amount on Hand at Close of Reporting Period (subtract Line 7 from Line 6-d)	\$ 18,267.74	\$ 25,259.91
Amount on Hand at Close of Reporting Period (subtract Line 7 from Line 6-d)	\$ 376.84	\$ 376.84

10. Amount and Obligations Owed TO the Committee (Report on Schedule C and/or Schedule D)
\$ - - -

11. Amount and Obligations Owed BY the Committee (Report on Schedule C and/or Schedule D)
\$ - - -

For further information contact
Federal Election Commission
444 E Street, N.W.
Washington, D.C. 20543

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

Darryl W. Southwell
[Signature]

9-27-89

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3X)

	Report Covering the Period	
	From <u>July 1, 1989</u>	to <u>September 30, 1989</u>
	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS		
CONTRIBUTIONS (other than loans) FROM:		
1. Individuals Persons Other Than Political Committees		
(a) Itemized (use Schedule A)	1,000.00	1,000.00
(b) Unitemized	745.00	745.00
Total of contributions from individuals	1,745.00	1,745.00
2. Political Party Committees	7,000.00	7,000.00
Other Political Committees (such as PACs)	--	--
3. TOTAL CONTRIBUTIONS (add 11(a)(iii) (b), and (c))	8,745.00	8,745.00
4. TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES	--	--
5. LOANS RECEIVED	--	--
6. LOAN REPAYMENTS RECEIVED	--	--
7. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	--	1,162.70
8. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	--	--
9. OTHER RECEIPTS (Dividends, Interest, etc.)	--	40.44
10. TOTAL RECEIPTS (add 11(d) 12 13 14 15 16 and 17)	8,745.00	9,948.14
II. DISBURSEMENTS		
11. OPERATING EXPENDITURES	--	1,422.17
12. TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES	--	--
13. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	5,000.00	5,250.00
14. INDEPENDENT EXPENDITURES (use Schedule E)		
15. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (BUS 50241a d) (use Schedule F)	4,747.74	4,747.74
16. LOAN REPAYMENTS MADE		
17. LOANS MADE		
18. REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals Persons Other Than Political Committees		
(b) Political Party Committees	--	5,000.00
(c) Other Political Committees (such as PACs)	--	5,000.00
19. CONTRIBUTION REFUNDS (add 26 a) b) and c)	--	5,000.00
20. OTHER DISBURSEMENTS	8,820.00	8,820.00
21. TOTAL DISBURSEMENTS (add 19 20 21 22 23 24 25 26 d)	18,567.74	25,739.91
III. NET CONTRIBUTIONS OPERATING EXPENDITURES		
22. NET CONTRIBUTIONS (other than loans) from Line 11 d)	8,745.00	8,745.00
23. CONTRIBUTION REFUNDS from Line 26 d)	--	5,000.00
24. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 24)	8,745.00	3,745.00
25. NET OPERATING EXPENDITURES (other than loans)	--	1,422.17
26. NET DISBURSEMENTS (other than loans) (subtract Line 25 from Line 24)	--	1,422.17
27. NET CONTRIBUTIONS (other than loans) (subtract Line 26 from Line 24)	--	2,322.83

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SCHEDULE A

ITEMIZED RECEIPTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 11(C)

All information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

REPUBLICAN PARTY OF DADE COUNTY

A. Full Name, Mailing Address and ZIP Code

REPUBLICAN NATIONAL COMMITTEE
WASHINGTON, DC.

Name of Employer

Date (month, day, year)

Amount of Each Receipt in this Period

8-24-89

7,000.00

Occupation

Aggregate Year to Date \$ 7,000

B. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt in this Period

Receipt For Primary General
 Other (specify)

Occupation

Aggregate Year to Date \$

C. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt in this Period

Occupation

Receipt For Primary General
 Other (specify)

Aggregate Year to Date \$

D. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt in this Period

Occupation

Receipt For Primary General
 Other (specify)

Aggregate Year to Date \$

E. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt in this Period

Occupation

Receipt For Primary General
 Other (specify)

Aggregate Year to Date \$

F. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt in this Period

Occupation

Receipt For Primary General
 Other (specify)

Aggregate Year to Date \$

G. Full Name, Mailing Address and ZIP Code

Name of Employer

Date (month, day, year)

Amount of Each Receipt in this Period

Occupation

Receipt For Primary General
 Other (specify)

Aggregate Year to Date \$

7,000.00

ITEMIZED COORDINATED EXPENDITURES MADE BY
POLITICAL PARTY COMMITTEES OR DESIGNATED AGENT(S)
ON BEHALF OF CANDIDATES FOR FEDERAL OFFICE
(2 U.S.C. §4416(d))

(To be used only by Political Committees in the General Election)

Name of Political Committee (in Full)
REPUBLICAN PARTY OF DADE COUNTY

Has this committee been organized to make coordinated expenditures by a political party committee? YES NO

Name, Mailing Address and ZIP Code of Each Payee
**REPUBLICAN PARTY OF DADE COUNTY
2505 SALZBERG
CORN MADISON, FL 33134**

Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported (State, District & Office Sought)	Purpose of Expenditure	Date (month, day, year)	Amount
DODD PRINTING, INC 245 W 75 PLACE MIAMI, FL 33114	LEANN ROSS LEHTINEN HOUSE	Campaign Literature	8.25.89	379.04
			8.25.89	98.70
Aggregate General Election Expenditure for this Candidate \$ 4,747.74				

Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported (State, District & Office Sought)	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate \$				

Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported (State, District & Office Sought)	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate \$				

Name, Mailing Address and ZIP Code of Each Payee	Name of Federal Candidate Supported (State, District & Office Sought)	Purpose of Expenditure	Date (month, day, year)	Amount
Aggregate General Election Expenditure for this Candidate \$				

4747.74

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 31

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

REPUBLICAN PARTY OF Duval County

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
ROS. LINTINI FOR CONGRESS 401 MIRACLE MILE #107 CORAL GABLES, FL 33134	Campaign Contribution Disbursement for <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify):	8-10-89	\$ 5,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL

5,000.00

00040394805

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1
FORM LINE NUMBER 27

NAME OF COMMITTEE (in Full)

REPUBLICAN PARTY OF INDIANA COUNTY

A Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
SUBSQUAWAN RADIO CORP.	GET OUT AND VOTE RADIO CAMPAIGN Disbursement for: <input checked="" type="checkbox"/> Other specific: <u>JOHN DAVIS</u> <input type="checkbox"/> Primary <input type="checkbox"/> General	8.24.89	\$ 2,400.00
HAM BISA BROADCASTING CO.	GET OUT AND VOTE RADIO CAMPAIGN Disbursement for: <input checked="" type="checkbox"/> Other specific: <u>JOHN DAVIS</u> <input type="checkbox"/> Primary <input type="checkbox"/> General	8.24.89	\$ 2,400.00
RADIO CENTRO BROADCASTING CO.	GET OUT AND VOTE RADIO CAMPAIGN Disbursement for: <input checked="" type="checkbox"/> Other specific: <u>JOHN DAVIS</u> <input type="checkbox"/> Primary <input type="checkbox"/> General	8.24.89	\$ 1,600.00
SANDS & HEDIN ADVERTISING CO.	GET OUT AND VOTE RADIO CAMPAIGN Disbursement for: <input checked="" type="checkbox"/> Other specific: <u>JOHN DAVIS</u> <input type="checkbox"/> Primary <input type="checkbox"/> General	8.25.89	2,000.00
BANK CHANGERS CAPITAL BANK	Disbursement for: <input type="checkbox"/> Other specific: <input type="checkbox"/> Primary <input type="checkbox"/> General		20.00
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL

TOTAL

\$ 820.00

90 FEB 22 AM 11:00

**DAVID W. SOUTHWELL
16857 N.W. 57th AVENUE
MIAMI, FLORIDA 33055**

February 19th, 1990

Mr. Jay E. Weidman
Supervisor
Federal Election Commission
149 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Weidman

RE: Mid-Year Report (11789-6/30/89)

1989 MID-YEAR REPORT: At the time of preparing the Mid-Year Report, neither the auditor's working papers were available, nor was there a copy of the 1988 Year-End Report on file or available to me, because of internal difficulties in the party. Consequently, it became necessary for me to "back into" the opening balance for the Mid-Year Report. Doing this resulted in my including as cash amounts which treated as outstanding checks in the 1988 Year-End Report.

On December 18th, 1988, the party held a general election which resulted in the gentleman who was Treasurer in 1988 not being reelected. The new Officers of the party opened new bank accounts on December 19th, at Capital Bank, and left an amount in the existing accounts at Terrabank to cover the outstanding checks and any miscellaneous charges which might be incurred in closing the accounts.

The difference between the ending balance on the 1988 Year-End Report and the beginning balance on the 1989 Mid-Year Report consists almost entirely of check amounts which were considered outstanding as of December 19, 1988, which is the last date of financial activity for the party in 1988. As those checks had not cleared by through May, 1989, the Terrabank account was finally closed and the balance transferred into the Capital Bank accounts.

As the difference between the balances does not represent unreported contributions, but rather checks issued which were not deposited by the recipients, and as it would be extremely difficult to attempt to reconstruct the bank reconciliations at this very late date, please accept this explanation as sufficient to explain the difference, and how it occurred. All of the report which I have prepared is complete and the ending balances are reconciled to the bank accounts. The only unreported items are checks issued in 1987 and/or 1988 which have not been deposited.

ALLOCATIONS This is a requirement of which we were not aware. This report, as far as I am able to find FEC reports, that any such allocations were ever made by this party. Consequently, I have the following questions:

1. What date were the required allocations obtained?

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To what extent must there be detail presented in the report of expenditures allocated between Federal and non-Federal accounts? Our operating account is the non-Federal account, and virtually all administrative expenses are paid through that account. May we simply present a total allocation of administrative expenses, or must we disclose each expenditure? Or should the allocation be reported in some other manner? The CFR does not offer any instruction to this point.

RE: [REDACTED] POST SPECIAL REPORT (7-1-82-9 IN 80)

1. **SCHEDULE F** The party was authorized by the Republican National Committee to make these expenditures on behalf of the candidate, and, in fact, received a contribution of \$7,000 for that purpose. I hope this clarifies this issue for you. Please notice that line 11(d) included the RNC contribution.

2. **"GET OUT AND VOTE RADIO CAMPAIGN"** The subject radio ads were not made on behalf of any specific candidate. Although there was a special federal election being held at the time of the ads, there was also a special state level election being held. These ads were not specific to any candidate, but were designed to encourage Republicans to get out and vote in the special election. We expended these funds from the Federal accounts because there was a "federal" seat up for election at that time and because there was money available in that account.

Had the subject ads been specific to a federal candidate, we would have included the amounts on Schedule B or F, as appropriate, and would have provided you with the appropriate information. Please notice that we did include both a Schedule B and F in that report.

3. **AFFILIATED COMMITTEE CONTRIBUTIONS** Your comment is duly noted and future reports will reflect any contributions on the line you indicated.

I sincerely hope that you will consider the above to be satisfactory responses to your comments and questions. It is our desire to both report all transactions correctly and to fully cooperate with the FEC regarding any questions or comments which may be forthcoming. If you have further questions or comments, you may find it convenient to call me in my office - 305-623-9118 or 305-794-7245.

Very truly yours

[Handwritten signature]
David J. Weidman
Director

3527-1177



**Republican
National
Committee**

90 MAR 15 AM 10:56

Jay C. Banning
Director of Administration
Comptroller

March 13, 1990

Mr. John D. Gibson
Assistant Staff Director
Reports Analysis Division
Federal Election Commission
Washington, D.C. 20463

Identification Number C00003418

Dear Mr. Gibson:

This is in response to your March 1 letter to William J. McManus regarding the September, 1989 Monthly Report of the Republican National Committee - Expenditures. We have re-examined our records and have found that although our response to your December 20 inquiry may have been incomplete, the RNC's contributions in connection with the election of Ileana Ros-Lehtinen did not exceed permissible limits, and were correctly reported by the RNC.

The special election in question took place on August 29, 1989. The Republican primary election was held on August 1, 1989. On July 20, 1989, the RNC made a \$5,000 contribution to "The Special Congressional Election Fund." A copy of our report of that contribution is attached. As your letter indicates, that Fund became an authorized committee of Ileana Ros-Lehtinen.

On August 3, 1989, the RNC made a \$5,000 contribution to the Ileana Ros-Lehtinen for Congress Committee. That contribution was intended for primary debt, and was reported as such in our September, 1989 report. A copy of the relevant page is attached. The RNC thus made a \$5,000 contribution allocable to the primary, and a \$5,000 contribution allocable to the general election.

An examination of the relevant portions of the reports of the Ileana Ros-Lehtinen for Congress Committee suggests that both of these contributions were reported as allocable to the general election, which, as our September, 1989 report clearly indicate was not the case. The Committee apparently reported the receipt of a \$5,000 contribution from the RNC on August 7 and a \$5,000 contribution on August 8. Both of these contributions appear to be allocated to the general election, which was clearly not the RNC's intention.

For your information, I am enclosing copies of both contribution checks. I would, in particular, call your attention to the reports

for purchase order for the August 3 check for Ileana Ros-Lehtinen for Congress. It, like the check stub, indicates a code "FLH018P." This is our indication that the contribution was intended for the Florida (FL) House/Congressional race (H) in the 18th district (018) primary (P).

Although there may have been an error in the reporting of these contributions by the recipient committees, our records indicate that the RNC's contributions were correctly reported by the RNC and were within permissible limits.

If we can be of any further assistance, please do not hesitate to contact me.

Sincerely,

Jay C. Banning
Assistant Treasurer

Enclosures

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PERIOD 07/01/89 TO 07/31/89
STATE 04/02/89

REPUBLICAN NATIONAL COMMITTEE
STATEMENT OF EXPENDITURE
SCHEDULE B - LINE 21A

NAME ADDRESS	PURPOSE OF EXPENDITURE	DATE	
PLANER FOR CONGRE PO BOX 2116 DURHAM NC 27613-2116	CONTRIBUTION TXH0119 TEXAS 12TH DISTRICT SPECIAL	07/17/89	
SENATORIAL CONGRESSIONAL OFFICE NO 200 BRIDGELL AVE DURHAM NC 27613	CONTRIBUTION	07/20/89	5,000.00
SENATOR FOR CONGRESS CHARLES TAYLOR 1017 MARKET STREET DURHAM NC 27601	CONTRIBUTION NCH011P N. CAROLINA 11TH DISTRICT PRIMARY	07/17/89	1,500.00
		PAGE TOTAL	11,500.00
		GRAND TOTAL	11,500.00

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PERIOD 08/01/89 TO 08/31/89
RUE DATE 09/07/89

REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES
ITEMIZED DISBURSEMENT
SCHEDULE B LINE 21A

PAGE 1/1

NAME ADDRESS	PURPOSE OF EXPENDITURE	DATE	AMOUNT
BERRY HILL FOR CONGRESS PO BOX 1506 CERRIS, CA 95307	CONTRIBUTION CAM0158 CALIFORNIA 15TH DISTRICT SPECIAL	08/23/89	5,000.00
BOB LANIER FOR CONGRESS P.O. BOX 2116 FT. WORTH TX 76113-2116	CONTRIBUTION TEND12R TEXAS 12TH DISTRICT RUN OFF	08/29/89	5,000.00
ILIANA ROE-LENTINIEN / CONGRESS 401 MIRACLE MILE #107 CORAL GABLES FL 33134	CONTRIBUTION FL#0189 FLORIDA 16TH DISTRICT PRIMARY	08/03/89	5,000.00
	PAGE TOTAL		15,000.00
	GRAND TOTAL		15,000.00

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7 1

VENDOR NUMBER	VENDOR NAME		CHECK DATE	CHECK NO
SPE030	The Special Congressional Election Fund		7/20/89	17683
INVOICE NO	INVOICE AMOUNT	AMOUNT	NET AMOUNT	EXPLANATION
SCEF0720	55,000.00		\$5,000.00	Contribution

2 0



Republican National Committee

1101 First Street Southeast, Washington, D.C. 20003

CHRYSTINA
2000 2000 BLDG
WASHINGTON VA 22104

CHECK NO **017683**

Pay to the order of ****5,000**** dollars and 00 cents

7/20/89 17683

PAY TO THE

Order of The Special Congressional Election Fund

\$5,000.00

NON-NEGOTIABLE

REQUEST FOR PURCHASE ORDER



Republican National Committee
210 First Street Southeast, Washington, D.C. 20543

VENDOR

The Special Congressional
Election Fund
1221 Brickell Ave.
Miami, Fla. 33131

DEPT.

Norm Cummings Budget

THIS IS A REQUEST.
NOT AN APPROVED PURCHASE ORDER.

MARK PACKAGES

FO#	Routing	Date Required	Terms	Date Prepared	2.0131- Prices
Summary of Quotations Obtained		Vendors			
Quantity	Description	List Price	Discount%	Net Unit Price	Extended Price
	Contribution				5,000.00
Remarks/Special Instructions:				SUBTOTAL	
Please handcut and call Political 15524				TAX, IF APPLICABLE	
				NET TOTAL	
Account Number	Requested By	Approved By	Financial Approval		
10 100 8010	Kewich	[Signature]			

92640394314

ORIGINAL

9 2 0 4 0 8 9 4 8 1 5

9 3

VENDOR NUMBER

VENDOR NAME

DATE

4000430

REPUBLICAN NATIONAL COMMITTEE

07/03/09 1763

INVOICE NO

IN

AMOUNT

ADJUSTMENT

NET AMOUNT

EXPLANATION

4000430

1,000

50,000.00

CONTRIBUTION TO



Republican National Committee

017731

1100 Connecticut Avenue, N.E. Washington, D.C. 20003

SMITHSONIAN INSTITUTION

DATE

CHECK NUMBER

07/03/09

1773

AMOUNT

\$50,000.00

NON-NEGOTIABLE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Ileana Ros-Lehtinen for Congress) Rad Referral 90L-6
Committee and its treasurer)

(MUR)
3054

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 19, 1990, the Commission decided by a vote of 4-0 to take the following actions in Rad Referral 90L-6:

1. Open a MUR.
2. Find reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer violated 2 U.S.C. §§ 433(c), 434(a)(6), and 441a(f).
3. Find reason to believe the Republican National Committee and William J. McManus, as treasurer; the National Republican Congressional Committee and Jack McDonald, as treasurer; the Republican Party of Florida and Shirlee Bowne, as treasurer; and the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.

(Continued)

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4. Approve the letters, Factual and Legal Analyses, and Interrogatories and Request for Documents to the Respondents, as recommended in the General Counsel's Report dated April 16, 1990.

Commissioners Elliott, Josefiak, McDonald, and McGarry voted affirmatively for the decision; Commissioners Aikens and Thomas did not cast votes.

Attest:

4-20-90
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Tues., April 17, 1990 11:01 a.m.
Circulated to the Commission: Tues., April 17, 1990 4:00 p.m.
Deadline for vote: Thurs., April 19, 1990 4:00 p.m.

dr

92040894318



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1990

David W. Southwell, Treasurer
Republican Party of Dade County
2905 Salzedo Street
Coral Gables, FL 33134

RE: MUR 3054
Republican Party of Dade
County and David W. Southwell,
as treasurer

Dear Mr. Southwell:

On April 19, 1990, the Federal Election Commission found that there is reason to believe the Republican Party of Dade County ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter.

92040894819

David W. Southwell
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

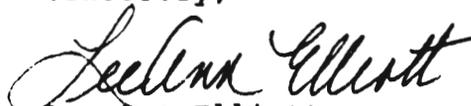
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request for documents

92040394820

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Republican Party of Dade County MUR 3054
 and David W. Southwell, as
 treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

9 2 0 4 0 8 9 4 8 2 1

The Ileana Ros-Lehtinen for Congress Committee ("the Ros-Lehtinen Committee") was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989. The Special Congressional Election Fund began operation in July 1989 with the intention of eventually becoming an authorized committee of the candidate who won the special primary. It became an authorized committee of Ileana Ros-Lehtinen on August 23, 1989, the date of the amended Statements of Candidacy and Organization.

The Ros-Lehtinen Committee raised \$1,053,638 and spent \$1,052,562 with respect to the 1989 special elections and ended the year with cash on hand of \$1,086 and no debts outstanding. It filed four reports covering the period from June 6, 1989, to December 31, 1989. For each of those reporting periods, the committee reported a surplus of cash on hand over outstanding debts. Thus, the reports indicate that the Committee did not

have net debts outstanding from either the special primary election or the special general election. The committee has not yet terminated. The Special Congressional Election Fund raised and spent \$22,600 in 1989 and filed one report covering the period from July 14, 1989, to November 18, 1989, which was designated as a termination report. All of its receipts came from contributions from party committees or the principal campaign committees of Members of Congress, and its funds were all transferred to the Ros-Lehtinen Committee on August 7th and August 16th before Ms. Ros-Lehtinen designated it as an authorized committee.¹

Excessive Contributions

The Act provides that any person may contribute an aggregate of \$1,000 with respect to any election to a candidate for federal office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441(a)(2)(A). A political committee may not knowingly accept a contribution in excess of these limitations. 2 U.S.C. § 441a(f). Commission regulations explain that an undesignated contribution is considered as made with respect to the next election. A designated contribution is considered made for the election

1. By transferring all of its funds to the principal campaign committee, the Fund became an affiliated committee of the principal campaign committee pursuant to 11 C.F.R. § 110.3(a)(1)(iii)(E) and, thus, shared a single contribution limitation for contributions received by the two committees from the same contributor. This shared limit applied even if it had not later been designated an authorized committee.

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designated, unless it is made after the designated election, in which case it can be made only if the campaign has net debts outstanding from the earlier election. 11 C.F.R. §§ 110.1(b) and 110.2(b)(3). The regulations also define net debts outstanding and provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. Id. Commission reporting forms provide for committees that make or receive contributions to indicate the election for which each contribution is made or received. See 11 C.F.R. § 104.2.

The reports filed by the Republican Party of Florida designated its August 9th \$5,000 contribution as made for the special primary election and an August 7th \$4,500 contribution for the special general election (they were reported as received on the 9th and 11th respectively). The special primary election contribution, however, was made after the August 1, 1989, special primary, and the Ros-Lehtinen Committee's reports indicate that it did not have net debts outstanding with respect to the special primary. In addition, the Ros-Lehtinen Committee also received a \$5,000 contribution from the Republican Party of Dade County on August 11, 1989. Under Commission regulations, all contributions made by a state party committee and all subordinate state party committees, including local county committees, are presumed made by one committee. 11 C.F.R. § 110.3(b)(2)(ii). In the absence of evidence to rebut the presumption, the amount of the contribution by the Republican Party of Dade County should be added to those by the Republican Party of Florida, resulting in

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the making of an aggregate excessive contribution.

In the period from July 1, 1989, to September 18, 1989, the Republican Party of Dade County had total receipts of \$8,745 of which \$7,000 was reported as a contribution from the RNC. In addition to the \$5,000 direct contribution to the Ros-Lehtinen Committee, the Republican Party of Dade County also made \$4,747.74 in coordinated party expenditures pursuant to 2 U.S.C. § 441a(d) on August 25th on behalf of Ileana Ros-Lehtinen. In a February 19, 1990, letter to RAD, the treasurer of the Republican Party of Dade County stated that it had been authorized by the RNC to make the coordinated expenditures and had received the \$7,000 for that purpose. The Republican Party of Dade County also reported making \$8,820.00 in GOTV disbursements on August 24th and 25th. In the same February 19, 1990, letter, the treasurer stated that the radio spots "were not made on behalf of any specific candidate." He said that there was a special state election at the same time as the special federal election and that the ads were designed to encourage Republicans to vote. He said the federal account was used to pay for them because of the special federal election and because that's where the money was. These circumstances indicate that there may be additional excessive contributions depending upon the validity of the coordinated party expenditures and the exempt payments.

Therefore, there is reason to believe the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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) MUR 3054
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INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: David W. Southwell, Treasurer
Republican Party of Dade County
2905 Salzedo Street
Coral Gables, FL 33134

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1987, to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

Reports filed with the Federal Election Commission disclose a contribution from the Republican Party of Dade County to the Ileana Ros-Lehtinen for Congress Committee of \$5,000 on August 11, 1989.

1. With respect to the above contribution, provide copies of the contributions checks and all correspondence to the Ileana Ros-Lehtinen for Congress Committee with respect to these contributions.

2. State whether the Republican National Committee authorized the Republican Party of Dade County to make Section 441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of such authorization. State the purpose of the \$7,000 transfer on August 24, 1989, from the Republican National Committee and provide copies of all correspondence relating to that transfer.

3. State whether the Republican Party of Florida has transferred funds to the Republican Party of Dade County in 1987, 1988, and 1989. If so, provide a schedule of the dates and amounts of all such transfers, whether or not made to the federal or nonfederal accounts of the Republican Party of Dade County.

4. State whether the Republican Party of Florida has requested or suggested to the Republican Party of Dade County that it make specific contributions to federal, state, or local candidates or has been consulted or worked in concert or cooperation with the Republican Party of Dade County in the making of any contributions to federal, state, or local candidates.

5. State whether the Republican Party of Dade County is recognized by the Republican Party of Florida as an affiliated organization. If so, provide the basis for such recognition, including party rules or by-laws and state law.

6. Provide copies of all scripts used for the radio advertisements represented by the \$8,820 in disbursements for get-out-the-vote activities in August 1989. Identify all other elections or offices to be voted on at the August 29th special election in Dade County.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1990

Jack McDonald, Treasurer
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3054
National Republican
Congressional Committee and
Jack McDonald, as treasurer

Dear Mr. McDonald:

On April 19, 1990, the Federal Election Commission found that there is reason to believe the National Republican Congressional Committee ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter.

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Jack McDonald
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

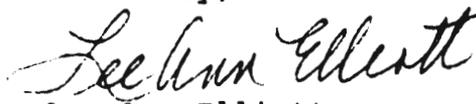
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Lee Ann Elliott
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request for documents

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: National Republican Congressional Committee and Jack McDonald, as treasurer **MUR 3054**

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Ileana Ros-Lehtinen for Congress Committee ("the Ros-Lehtinen Committee") was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989. The Special Congressional Election Fund began operation in July 1989 with the intention of eventually becoming an authorized committee of the candidate who won the special primary. It became an authorized committee of Ileana Ros-Lehtinen on August 23, 1989, the date of the amended Statements of Candidacy and Organization.

The Ros-Lehtinen Committee raised \$1,053,638 and spent \$1,052,562 with respect to the 1989 special elections and ended the year with cash on hand of \$1,086 and no debts outstanding. It filed four reports covering the period from June 6, 1989, to December 31, 1989. For each of those reporting periods, the committee reported a surplus of cash on hand over outstanding debts. Thus, the reports indicate that the Committee did not

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have net debts outstanding from either the special primary election or the special general election. The committee has not yet terminated. The Special Congressional Election Fund raised and spent \$22,600 in 1989 and filed one report covering the period from July 14, 1989, to November 18, 1989, which was designated as a termination report. All of its receipts came from contributions from party committees or the principal campaign committees of Members of Congress, and its funds were all transferred to the Ros-Lehtinen Committee on August 7th and August 16th before Ms. Ros-Lehtinen designated it as an authorized committee.¹

Excessive Contributions

The Act provides that any person may contribute an aggregate of \$1,000 with respect to any election to a candidate for federal office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441(a)(2)(A). A political committee may not knowingly accept a contribution in excess of these limitations. 2 U.S.C. § 441a(f). Commission regulations explain that an undesignated contribution is considered as made with respect to the next election. A designated contribution is considered made for the election

1. By transferring all of its funds to the principal campaign committee, the Fund became an affiliated committee of the principal campaign committee pursuant to 11 C.F.R. § 110.3(a)(1)(iii)(E) and, thus, shared a single contribution limitation for contributions received by the two committees from the same contributor. This shared limit applied even if it had not later been designated an authorized committee.

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designated, unless it is made after the designated election, in which case it can be made only if the campaign has net debts outstanding from the earlier election. 11 C.F.R. §§ 110.1(b) and 110.2(b)(3). The regulations also define net debts outstanding and provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. Id. Commission reporting forms provide for committees that make or receive contributions to indicate the election for which each contribution is made or received. See 11 C.F.R. § 104.2.

The National Republican Congressional Committee reports making a July 29th \$5,000 contribution as designated for the special primary to the Special Congressional Election Fund and a August 3rd \$4,500 contribution to the Ros-Lehtinen Committee.² At the time it made this contribution to the Fund, the Fund had not yet been designated as an authorized committee, though it had indicated in filing its Statement of Organization with the Commission that it intended to become one after the nominee was chosen. The Fund was not designated by Ms. Ros-Lehtinen as an authorized committee until August 23rd. It reported receiving

2. The NRCC also reported making in-kind contributions of \$62.10 for mailing service and \$437.90 for telemarketing on behalf of the Ros-Lehtinen Committee with respect to the special general election. The Ros-Lehtinen Committee reported the receipt of this \$500 contribution, but it was itemized among the in-kind contributions from individuals. Therefore, the total excessive contribution from NRCC is \$5,000.

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the July 29th contribution on August 8th.³ Commission regulations provide that a contribution is made either when delivered to the candidate or the candidate's agent or, if mailed, on the date of the postmark. 11 C.F.R. § 110.2(b)(6). Nevertheless, the date of the making of the contribution to the Fund is not determinative. As noted, the Fund was set up to raise funds for the eventual nominee. Therefore, all contributions to the Fund should be treated as made for the general election and should have been so reported.⁴

Therefore, there is reason to believe the National Republican Congressional Committee and Jack McDonald, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.

3. These dates are somewhat confusing and may be incorrect. The Fund reported transferring \$19,000 of its \$22,600 to the Ros-Lehtinen Committee on August 7th, but reports all receipts, including \$15,000 from three national party committees, with the date of August 8th. The Fund may have been reporting the date of deposit rather than the date of receipt as required by the regulations at 11 C.F.R. § 104.3(a)(4)(i).

4. The NRCC reported making a total of \$47,836 in coordinated party expenditures on behalf of Ileana Ros-Lehtinen in addition to the \$4,747 in coordinated party expenditures made by the Republican Party of Dade County, with the alleged authorization of the RNC. The coordinated party expenditure limitation for the 1989 special elections was \$23,990 each for the Republican Party of Florida and the RNC. Thus, the aggregate amount of reported coordinated party expenditures of \$52,583 exceeds the aggregate limitations by \$4,603.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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) MUR 3054
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INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: Jack McDonald, Treasurer
National Republican Congressional Committee
320 First Street, S.E.
Washington, D.C. 20003

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1989, to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

Reports filed with the Federal Election Commission disclose contributions from the National Republican Congressional Committee to the Ileana Ros-Lehtinen for Congress Committee of \$4,500 on August 3, 1989, \$62.10 on August 24, 1989, and \$437.90 on August 28, 1989, and to the Special Congressional Election Fund of \$5,000 on July 29, 1989.

1. With respect to all of the above contributions, provide copies of the contributions checks and all correspondence to the Ileana Ros-Lehtinen for Congress Committee with respect to these contributions.

2. With respect to the \$5,000 contribution to the Special Congressional Election Fund, state the date this contributions was delivered to the committee or, if mailed, the date of mailing or postmark. State whether the NRCC was aware at the time it made this contribution that the Special Congressional Election Fund was established with the intention of its becoming an authorized committee of Ileana Ros-Lehtinen with respect to the special election on August 29, 1989.

3. State whether the Republican National Committee and the Republican Party of Florida authorized the NRCC to make Section 441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of each such authorization.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1990

William J. McManus, Treasurer
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3054
Republican National Committee
and William J. McManus, as
treasurer

Dear Mr. McManus:

On April 19, 1990, the Federal Election Commission found that there is reason to believe the Republican National Committee ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter.

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William J. McManus
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Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

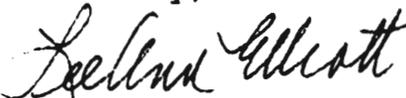
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures

- Factual and Legal Analysis
- Procedures
- Designation of Counsel Form
- Interrogatories and Request for documents

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Republican National Committee MUR 3054
and William J. McManus, as
treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

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The Ileana Ros-Lehtinen for Congress Committee ("the Ros-Lehtinen Committee") was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989. The Special Congressional Election Fund began operation in July 1989 with the intention of eventually becoming an authorized committee of the candidate who won the special primary. It became an authorized committee of Ileana Ros-Lehtinen on August 23, 1989, the date of the amended Statements of Candidacy and Organization.

The Ros-Lehtinen Committee raised \$1,053,638 and spent \$1,052,562 with respect to the 1989 special elections and ended the year with cash on hand of \$1,086 and no debts outstanding. It filed four reports covering the period from June 6, 1989, to December 31, 1989. For each of those reporting periods, the committee reported a surplus of cash on hand over outstanding debts. Thus, the reports indicate that the Committee did not

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have net debts outstanding from either the special primary election or the special general election. The committee has not yet terminated. The Special Congressional Election Fund raised and spent \$22,600 in 1989 and filed one report covering the period from July 14, 1989, to November 18, 1989, which was designated as a termination report. All of its receipts came from contributions from party committees or the principal campaign committees of Members of Congress, and its funds were all transferred to the Ros-Lehtinen Committee on August 7th and August 16th before Ms. Ros-Lehtinen designated it as an authorized committee.¹

Excessive Contributions

The Act provides that any person may contribute an aggregate of \$1,000 with respect to any election to a candidate for federal office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441(a)(2)(A). A political committee may not knowingly accept a contribution in excess of these limitations. 2 U.S.C. § 441a(f). Commission regulations explain that an undesignated contribution is considered as made with respect to the next election. A designated contribution is considered made for the election

1. By transferring all of its funds to the principal campaign committee, the Fund became an affiliated committee of the principal campaign committee pursuant to 11 C.F.R. § 110.3(a)(1)(iii)(E) and, thus, shared a single contribution limitation for contributions received by the two committees from the same contributor. This shared limit applied even if it had not later been designated an authorized committee.

designated, unless it is made after the designated election, in which case it can be made only if the campaign has net debts outstanding from the earlier election. 11 C.F.R. §§ 110.1(b) and 110.2(b)(3). The regulations also define net debts outstanding and provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. Id. Commission reporting forms provide for committees that make or receive contributions to indicate the election for which each contribution is made or received. See 11 C.F.R. § 104.2.

The Republican National Committee made a contribution of \$5,000 to the Special Congressional Election Fund on July 26th, six days before the primary, but it did not indicate any designation on its reports. The Fund reported receiving it on August 8th. The Fund's transfers to the Ros-Lehtinen Committee were made on August 7th (\$19,000) and August 16th (\$3,600). The RNC also made an August 3rd \$5,000 contribution to the Ros-Lehtinen Committee with respect to the special general election which the committee reported receiving on August 7th. The date of the making of the contribution to the Fund is not determinative. As noted, the Fund was set up to raise funds for the eventual nominee. All contributions to the Fund should be treated as made with respect to the general election and should have been so reported.

On March 15, 1990, the RNC amended its reports to clarify that the contribution to the Fund was for the general election and that the August 3rd contribution to the Ros-Lehtinen

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Committee was for primary debt retirement. As noted, there is no indication that the Ros-Lehtinen Committee had net debts outstanding from the primary election. Thus, this contribution should be treated as made with respect to the general election.

Therefore, there is reason to believe the Republican National Committee and William J. McManus, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
) MUR 3054
)

INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: William J. McManus, Treasurer
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1989, to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

Reports filed with the Federal Election Commission disclose contributions from the Republican National Committee to the Ileana Ros-Lehtinen for Congress Committee of \$5,000 on August 3, 1989, and to the Special Congressional Election Fund of \$5,000 on July 26, 1989.

1. With respect to each of the above contributions, provide copies of the contributions checks and all correspondence to the Ileana Ros-Lehtinen for Congress Committee with respect to these contributions.

2. With respect to the \$5,000 contribution to the Special Congressional Election Fund, state the date this contributions was delivered to the committee or, if mailed, the date of mailing or postmark. State whether the RNC was aware at the time it made this contribution that the Special Congressional Election Fund was established with the intention of its becoming an authorized committee of Ileana Ros-Lehtinen with respect to the special election on August 29, 1989.

3. State whether the Republican National Committee authorized the NRCC to make Section 441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of each such authorization.

4. State whether the Republican National Committee authorized the Republican Party of Dade County to make Section 441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. If so, provide a copy of such authorization.

5. State the purpose of the Republican National Committee's transfer of \$7,000 to the Republican Party of Dade County on August 24, 1989, and provide a copy of all correspondence relating to that transfer.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1990

Shirlee Bowne, Treasurer
Republican Party of Florida
P.O. Box 311
Tallahassee, FL 32302

RE: MUR 3054
Republican Party of Florida
and Shirlee Bowne, as
treasurer

Dear Ms. Bowne:

On April 19, 1990, the Federal Election Commission found that there is reason to believe the Republican Party of Florida ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter.

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Shirlee Bowne
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

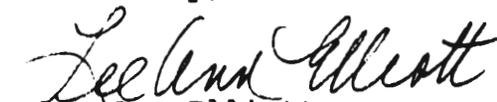
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request for documents

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Republican Party of Florida MUR 3054
and Shirlee Bowne, as
treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Ileana Ros-Lehtinen for Congress Committee ("the Ros-Lehtinen Committee") was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989. The Special Congressional Election Fund began operation in July 1989 with the intention of eventually becoming an authorized committee of the candidate who won the special primary. It became an authorized committee of Ileana Ros-Lehtinen on August 23, 1989, the date of the amended Statements of Candidacy and Organization.

The Ros-Lehtinen Committee raised \$1,053,638 and spent \$1,052,562 with respect to the 1989 special elections and ended the year with cash on hand of \$1,086 and no debts outstanding. It filed four reports covering the period from June 6, 1989, to December 31, 1989. For each of those reporting periods, the committee reported a surplus of cash on hand over outstanding debts. Thus, the reports indicate that the Committee did not

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have net debts outstanding from either the special primary election or the special general election. The committee has not yet terminated. The Special Congressional Election Fund raised and spent \$22,600 in 1989 and filed one report covering the period from July 14, 1989, to November 18, 1989, which was designated as a termination report. All of its receipts came from contributions from party committees or the principal campaign committees of Members of Congress, and its funds were all transferred to the Ros-Lehtinen Committee on August 7th and August 16th before Ms. Ros-Lehtinen designated it as an authorized committee.¹

Excessive Contributions

The Act provides that any person may contribute an aggregate of \$1,000 with respect to any election to a candidate for federal office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441(a)(2)(A). A political committee may not knowingly accept a contribution in excess of these limitations. 2 U.S.C. § 441a(f). Commission regulations explain that an undesignated contribution is considered as made with respect to the next election. A designated contribution is considered made for the election

1. By transferring all of its funds to the principal campaign committee, the Fund became an affiliated committee of the principal campaign committee pursuant to 11 C.F.R. § 110.3(a)(1)(iii)(E) and, thus, shared a single contribution limitation for contributions received by the two committees from the same contributor. This shared limit applied even if it had not later been designated an authorized committee.

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designated, unless it is made after the designated election, in which case it can be made only if the campaign has net debts outstanding from the earlier election. 11 C.F.R. §§ 110.1(b) and 110.2(b)(3). The regulations also define net debts outstanding and provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. Id. Commission reporting forms provide for committees that make or receive contributions to indicate the election for which each contribution is made or received. See 11 C.F.R. § 104.2.

The reports filed by the Republican Party of Florida designated its August 9th \$5,000 contribution as made for the special primary election and an August 7th \$4,500 contribution for the special general election (they were reported as received on the 9th and 11th respectively). The special primary election contribution, however, was made after the August 1, 1989, special primary, and the Ros-Lehtinen Committee's reports indicate that it did not have net debts outstanding with respect to the special primary. Therefore, this contribution would appear excessive.

Therefore, there is reason to believe the Republican Party of Florida and Shirlee Bowne, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1987, to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

Reports filed with the Federal Election Commission disclose contributions from the Republican Party of Florida to the Ileana Ros-Lehtinen for Congress Committee of \$4,500 on August 7, 1989, and of \$5,000 on August 9, 1989.

1. With respect to each of the above contributions, provide copies of the contributions checks and all correspondence to the Ileana Ros-Lehtinen for Congress Committee with respect to these contributions.

2. State whether the Republican Party of Florida authorized the NRCC to make Section 441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of such authorization.

3. State whether the Republican Party of Florida has transferred funds to the Republican Party of Dade County in 1987, 1988, and 1989. If so, provide a schedule of the dates and amounts of all such transfers, whether or not made to the federal or nonfederal accounts of the Republican Party of Dade County.

4. State whether the Republican Party of Florida has requested or suggested to the Republican Party of Dade County that it make specific contributions to federal, state, or local candidates or has been consulted or worked in concert or cooperation with the Republican Party of Dade County in the making of any contributions to federal, state, or local candidates.

5. State whether the Republican Party of Florida recognizes the Republican Party of Dade County as an affiliated organization. If so, provide the basis for such recognition, including party rules or by-laws and state law.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 26, 1990

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2784
Miami, FL 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and its treasurer

Dear Mr. Martinez:

On April 19, 1990, the Federal Election Commission found that there is reason to believe the Ileana Ros-Lehtinen for Congress Committee ("Committee") and its treasurer, violated 2 U.S.C. §§ 433(c), 434(a)(6), and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and its treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and its treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter. Further, the Commission will not entertain requests for

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Jose M. Martinez-Armesto
Page 2

pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures

Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request
for Documents

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Ileana Ros-Lehtinen for **MUR 3054**
Congress Committee and
its treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

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The Ileana Ros-Lehtinen for Congress Committee ("the Ros-Lehtinen Committee") was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989. This matter also involves the Special Congressional Election Fund which began operation in July 1989 with the intention of eventually becoming an authorized committee of the candidate who won the special primary. It became an authorized committee of Ileana Ros-Lehtinen on August 23, 1989, the date of the amended Statements of Candidacy and Organization.

The Ros-Lehtinen Committee raised \$1,053,638 and spent \$1,052,562 with respect to the 1989 special elections and ended the year with cash on hand of \$1,086 and no debts outstanding. It filed four reports covering the period from June 6, 1989, to December 31, 1989. For each of those reporting periods, the committee reported a surplus of cash on hand over outstanding

debts. Thus, the reports indicate that the Committee did not have net debts outstanding from either the special primary election or the special general election. The committee has not yet terminated. The Special Congressional Election Fund raised and spent \$22,600 in 1989 and filed one report covering the period from July 14, 1989, to November 18, 1989, which was designated as a termination report. All of its receipts came from contributions from party committees or the principal campaign committees of Members of Congress, and its funds were all transferred to the Ros-Lehtinen Committee on August 7th and August 16th before Ms. Ros-Lehtinen designated it as an authorized committee.¹

A. Failure to File 48-Hour Notifications

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that the principal campaign committee of a candidate shall file notifications of any contribution of \$1,000 or more received by any authorized committee after the 20th day but more than 48 hours before any election. This notification shall be made within 48 hours after the receipt of such contribution and shall include the name of the candidate and the office sought, the identification of the contributor, and the date of receipt and amount of the contribution. 2 U.S.C.

1. By transferring all of its funds to the principal campaign committee, the Fund became an affiliated committee of the principal campaign committee pursuant to 11 C.F.R. § 110.3(a)(1)(iii)(E) and, thus, shared a single contribution limitation for contributions received by the two committees from the same contributor. This shared limit applied even if it had not later been designated an authorized committee.

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§ 434(a)(6)(A). This notification shall be in addition to all other reporting requirements under the Act. 2 U.S.C.

§ 434(a)(6)(B). The Act defines "identification" to mean in the case of any individual, the name, the mailing address, and the occupation of each individual as well as the name of his or her employer and in the case of any other person, the full name and mailing address. 2 U.S.C. § 431(13).

A review of the reports filed by the Ros-Lehtinen Committee has identified 25 contributions totaling \$29,000 that were received between the 20th day but more than 48 hours prior to the special general election. A listing of these contributions is set out in Chart B. These contributions were received on the following dates and in the indicated aggregate amounts on those dates:

Date Received	Aggregate Amount
August 11th	\$7,000
August 16th	4,000
August 17th	2,000
August 21st	1,000
August 25th	15,000
Total	\$29,000

These contributions were not reported within 48 hours of their receipt as required by Section 434(a)(6).

Therefore, there is reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer violated 2 U.S.C.

§ 434(a)(6).

B. Receipt of Excessive Contributions

The Act provides that any person may contribute an aggregate of \$1,000 with respect to any election to a candidate for federal

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office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441(a)(2)(A). A political committee may not knowingly accept a contribution in excess of these limitations. 2 U.S.C. § 441a(f). Commission regulations explain that an undesignated contribution is considered as made with respect to the next election. A designated contribution is considered made for the election designated, unless it is made after the designated election, in which case it can be made only if the campaign has net debts outstanding from the earlier election. 11 C.F.R. §§ 110.1(b) and 110.2(b)(3). The regulations also define net debts outstanding and provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. Id. Commission reporting forms provide for committees that make or receive contributions to indicate the election for which each contribution is made or received. See 11 C.F.R. § 104.2.

A review of the reports of the principal and authorized campaign committees has identified four individuals and three multicandidate political party committees who made excessive contributions to the campaign. These contributions are set out in Chart A. In the case of the individual contributors, the contributor made contributions after the special primary election and before the special general election that in the aggregate exceeded the contributor's limitation with respect to the special general election. As previously noted, the reports filed by the

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principal campaign committee indicate that the campaign was in a surplus position after the special primary election and, thus, did not have net debts outstanding with respect to that election. Thus, these contributions would remain excessive whether or not they were designated or redesignated for the earlier special primary election. See 11 C.F.R. §§ 110.1(b)(3) and 110.2(b)(3).

The three multicandidate political party committee contributions were made by the Republican Party of Florida, the National Republican Congressional Committee ("NRCC"), and the Republican National Committee ("RNC"). The Ros-Lehtinen Committee and the Special Congressional Election Fund reported all of them as made for the general election.

The reports filed by the Republican Party of Florida designated its August 9th \$5,000 contribution as made for the special primary election and an August 7th \$4,500 contribution for the special general election (they were reported as received on the 9th and 11th respectively). The special primary election contribution, however, was made after the August 1, 1989, special primary, and the Ros-Lehtinen Committee's reports indicate that it did not have net debts outstanding with respect to the special primary. Therefore, this contribution would appear excessive. In addition, the Ros-Lehtinen Committee also received a \$5,000 contribution from the Republican Party of Dade County on August 11, 1989. Under Commission regulations, all contributions made by a state party committee and all subordinate state party committees, including local county committees, are presumed made by one committee. 11 C.F.R. § 110.3(b)(2)(ii). In the absence

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of evidence to rebut the presumption, the amount of the contribution by the Republican Party of Dade County should be added to those by the Republican Party of Florida, resulting in the receipt of an aggregate excessive contribution of \$9,500.

The National Republican Congressional Committee reports making a July 29th \$5,000 contribution as designated for the special primary to the Special Congressional Election Fund and a August 3rd \$4,500 contribution to the Ros-Lehtinen Committee.² At the time it made this contribution to the Fund, the Fund had not yet been designated as an authorized committee, though it had indicated in filing its Statement of Organization with the Commission that it intended to become one after the nominee was chosen. The Fund was not designated by Ms. Ros-Lehtinen as an authorized committee until August 23rd. It reported receiving the July 29th contribution on August 8th.³ Commission regulations provide that a contribution is made either when delivered to the candidate or the candidate's agent or, if mailed, on the date of the postmark. 11 C.F.R. § 110.2(b)(6).

2. The NRCC also reported making in-kind contributions of \$62.10 for mailing service and \$437.90 for telemarketing on behalf of the Ros-Lehtinen Committee with respect to the special general election. The Ros-Lehtinen Committee reported the receipt of this \$500 contribution, but it was itemized among the in-kind contributions from individuals. Therefore, the total excessive contribution from NRCC is \$5,000.

3. These dates are somewhat confusing and may be incorrect. The Fund reported transferring \$19,000 of its \$22,600 to the Ros-Lehtinen Committee on August 7th, but reports all receipts, including \$15,000 from three national party committees, with the date of August 8th. The Fund may have been reporting the date of deposit rather than the date of receipt as required by the regulations at 11 C.F.R. § 104.3(a)(4)(i).

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Nevertheless, the date of the making of the contribution to the Fund is not determinative. As noted, the Fund was set up to raise funds for the eventual nominee. Therefore, all contributions to the Fund should be treated as made for the general election and should have been so reported.⁴

The Republican National Committee also made a contribution of \$5,000 to the Special Congressional Election Fund on July 26th, six days before the primary, but it did not indicate any designation on its reports. The Fund reported receiving it on August 8th. The Fund's transfers to the Ros-Lehtinen Committee were made on August 7th (\$19,000) and August 16th (\$3,600). The RNC also made an August 3rd \$5,000 contribution to the Ros-Lehtinen Committee with respect to the special general election which the committee reported receiving on August 7th. As with the NRCC contribution, the date of the making of the contribution to the Fund is not determinative. All contributions to the Fund should be treated as made with respect to the general election and should have been so reported. On March 15, 1990, the RNC amended its reports to clarify that the contribution to the Fund was for the general election and that the August 3rd contribution to the Ros-Lehtinen Committee was for primary debt

4. The NRCC reported making a total of \$47,836 in coordinated party expenditures on behalf of Ileana Ros-Lehtinen in addition to the \$4,747 in coordinated party expenditures made by the Republican Party of Dade County, with the alleged authorization of the RNC. The coordinated party expenditure limitation for the 1989 special elections was \$23,990 each for the Republican Party of Florida and the RNC. Thus, the aggregate amount of reported coordinated party expenditures of \$52,583 exceeds the aggregate limitations by \$4,603.

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retirement. As noted, there is no indication that the Ros-Lehtinen Committee had net debts outstanding from the primary election. Thus, this contribution should be treated as made with respect to the general election.

Thus, the total amount of excessive contributions is \$22,300, computed as follows:

Four Individuals	\$2,800
Republican Party of Florida (including Dade County)	9,500
NRCC	5,000
RNC	5,000
Total	<u>\$22,300</u>

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Although two of these excessive contributions were made to the Special Congressional Election Fund rather than the principal campaign committee, all three contributions are included in the finding made with respect to the principal campaign committee. The Ros-Lehtinen Committee had a responsibility to ascertain the source of monies held by the Fund at the time of the transfer. Thus, once the candidate designated the Fund as an authorized committee and the Fund transferred all of its funds to the Ros-Lehtinen Committee, the Ros-Lehtinen Committee had, in effect, knowingly accepted excessive contributions. See Advisory Opinion 1977-16.

Therefore, there is reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer violated 2 U.S.C. § 441a(f).

The former treasurer wrote to the individuals and committees who made apparent excessive contributions. There are portions of these letters that require additional comment. First, the

letters to the individuals request written permission to consider the excessive portion of the contribution as a contribution from a spouse or relative, who is over 21 years old, and to provide a statement that the funds are the spouse's or relative's and not a gift from the contributor. Because the contributor presumably used his or her own funds to make the initial contribution, the committee appears to be asking that the contributor make the contribution in the name of another person, which is prohibited by 2 U.S.C. § 441f. Second, all of the letters ask for written permission to treat the contribution as for debt retirement or for the re-election campaign. As noted, the committee's reports indicate that it did not have net debts outstanding at the time these contributions were received and did not end the election cycle for the special election with debts outstanding. Therefore, it does not appear possible that the excessive portions of these contributions can be allocated to debt retirement. Contributions made to retire debts are still subject to the contribution limitations for the election to which the debts are attributed. See 11 C.F.R. §§ 110.1(g) and 110.2(g); Advisory Opinions 1989-22, 1989-15, and 1989-10. Furthermore, the reports show that the authorized committees expended all but \$1,086 of their receipts with respect to the special elections. Since the excessive portions of these contributions have already been expended in an earlier election, they cannot be attributed to the 1990 re-election campaign. Therefore, the suggestions made to the contributors as methods to correct the excessive contributions are incorrect and erroneous in all respects. See

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Advisory Opinion 1989-15.

C. Failure to Notify Commission of Treasurer Change

The Act also provides that every committee shall have a treasurer and that no contributions or expenditure shall be accepted or made during any period in which the office of treasurer is vacant. 2 U.S.C. § 432(a). The Act further requires each political committee to identify the name and address of its treasurer on its Statement of Organization and to notify the Commission of any change of information on its statement within 10 days of such change. 2 U.S.C. §§ 433(b)(4) and 433(c). Commission regulations explain that notice of any change may be made by filing an amended Statement of Organization or by filing a letter noting the change. 11 C.F.R. § 102.2(a)(2).

In a letter to the reports analyst, dated January 24, 1990, Richard Preston Tonkinson, the former treasurer of record for the principal campaign committee, stated that he was no longer the treasurer of the committee, having resigned effective December 31, 1989. He added that he informed Rep. Ros-Lehtinen of his resignation on January 6, 1990, and understood "that she is in the process of finding a replacement." To date, no filing has been made with the Commission noting a new treasurer for the committee. Rep. Ros-Lehtinen signed the 1989 Year End Report.

Therefore, there is reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer violated 2 U.S.C. § 433(c).

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

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MUR 3054

**INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS**

TO: Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
8421-B N.W. 56th Street
Miami, FL 33166

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1989, to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

1. Identify the person who succeeded Richard Preston Tonkinson as treasurer of the Ileana Ros-Lehtinen for Congress Committee ("Committee") and state the date such person became treasurer. Identify all contributions received and expenditures made by the Committee from December 31, 1989, to the date the new treasurer was named.

2. With regard to the following contributions, provide copies of the contribution checks and all correspondence that accompanied these contributions and state the date of receipt of each contribution or, if mailed, the date of mailing or postmark.

<u>Contributor</u>	<u>Date</u>	<u>Amount</u>
Frederick W. Guardabassi	8-25-89	\$500
Robin Kaskal	8-30-89	\$1,000
Alma E. Morissette	8-25-89	\$1,000
Fernando Rodriguez	8-25-89	\$300
Republican Party of Florida	8-9-89 8-11-89	\$4,500 \$5,000
National Republican Congressional Committee	8-7-89 8-8-89	\$4,500 \$5,000 ¹
Republican National Committee	8-7-89 8-8-89	\$5,000 \$5,000 ²
Republican Party of Dade County	8-11-89	\$5,000

3. Provide copies of all documents relating to the Special Congressional Election Fund and its designation as an authorized committee.

1. Contribution was made to the Special Congressional Election Fund.

2. Contribution was made to the Special Congressional Election Fund.

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MUR 3054
Ros-Lehtinen Committee
Page 5

4. Provide copies of all correspondence received from the January 1990 letters from Richard Preston Tonkinson to the contributors identified in Question 2.

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BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)	
)	
Ileana Ros-Lehtinen for)	MUR 3054
Congress and Jose M.)	
Martinez-Armesto, as)	
treasurer)	

GENERAL COUNSEL'S REPORT

On April 19, 1990, the Commission found reason to believe the Ileana Ros-Lehtinen for Congress ("the Committee") and its treasurer had violated 2 U.S.C. §§ 433(c), 434(a)(6), and 441a(f). This Office noted in the First General Counsel's Report, dated April 16, 1990, that the Committee's treasurer Richard Preston Tonkinson had resigned on January 24, 1990, without a new treasurer being named at that time. We therefore proposed that the notification letter and questions be sent to Representative Ros-Lehtinen, who had signed the 1989 Year End Report for the Committee.

This Office has since discovered that on March 29, 1990, the Committee filed an amended Statement of Organization naming Jose M. Martinez-Armesto as the new treasurer. The amended statement is dated March 19, 1990. See Attachment 1. Therefore, the finding that the Committee had failed to notify the Commission of a change in treasurer within 10 days of such change remains valid until further investigation ascertains when the change actually occurred.

Nevertheless, because the Committee now has a new treasurer, the notification letter and questions have been instead directed to the new treasurer Jose M. Martinez-Armesto rather than

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Representative Ros-Lehtinen.

Moreover, the new treasurer belatedly replied on April 20, 1990, to RAD's previous inquiries regarding the excessive contributions from the Republican National Committee and the National Republican Congressional Committee. See Attachment 2. The Committee's further reply to the questions accompanying the notification letter should resolve the issues regarding these contributions. As noted in the First General Counsel's Report, the designation of these contributions for the special primary election still remains contingent on the ability of the Committee to demonstrate whether it had net debts outstanding from the primary at the time the subject contributions were made.

Once responses from all of the respondents are received, this Office will further report to the Commission with appropriate recommendations.

Lawrence M. Noble
General Counsel

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Date 4/27/90

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Amended Statement of Organization
2. Reply to RFAIs

Staff persons: Jeffrey D. Long
George F. Rishel

HAND DELIVERED
866 6194
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM



90 MAY 10 AM 9:45

HOUSE OF REPRESENTATIVES

ILEANA ROS-LEHTINEN

P.O. Box 52-2784
Miami, FL 33152-2784

May 7, 1990

Mr. Lawrence M. Noble
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: MUR 3054

Dear Mr. Noble:

Regarding MUR 3054, the Ileana Ros-Lehtinen for Congress Committee is researching its files and records to be able to answer thoroughly the questions raised by the Commission.

However, as is noted in MUR 3054, I was not the Treasurer during the election. Consequently, in order to contact the appropriate parties involved so that we may respond fully, I am respectfully requesting a twenty day extension until May 31, 1990 to file our response.

Thank you for your consideration.

Sincerely,

Jose M. Martinez
Jose M. Martinez, Treasurer
Ileana Ros-Lehtinen for Congress

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 MAY 10 PM 2:03

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 14, 1990

Mr. Jose M. Martinez, Treasurer
Ileana Ros-Lehtinen for Congress
U.S. House of Representatives
P.O. Box 52-2784
Miami, FL 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez, as treasurer

Dear Mr. Martinez:

This is in response to your letter dated May 7, 1990, which we received on May 10, 1990, requesting an extension of 16 days to respond to the Commission's inquiry. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on May 31, 1990.

If you have any questions, please contact Jeff Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in cursive script, appearing to read "George F. Rishel".

BY: George F. Rishel
Assistant General Counsel

92040894380

06C 6232

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

May 14, 1990

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jeffrey D. Long

Re: MUR 3054 (National Republican
Congressional Committee and Jack
McDonald, as Treasurer)

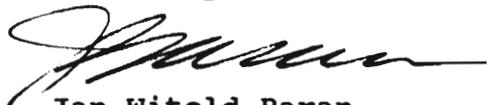
Dear Mr. Noble:

This Office represents the National Republican
Congressional Committee and Jack McDonald, as Treasurer
("Respondents") in the above-captioned matter.¹ An executed
Statement of Designation of Counsel is attached hereto.

This Response is submitted on behalf of Respondents in
reply to the Interrogatories and Request for Documents issued
by the Federal Election Commission to the National Republican
Congressional Committee on April 26, 1990.

Enclosed are the sworn answers to these Interrogatories
and Requests, along with their corresponding Exhibits.

Sincerely,


Jan Witold Baran

Enclosure

cc: Nancy Marshall
Steve Edwards

¹ The National Republican Congressional Committee
amended its Statement of Organization by letter dated August
23, 1989 which indicated that Jack McDonald had resigned as
Treasurer.

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FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
30 MAY 16 PM 3:17

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3054

NAME OF COUNSEL: Jan Baran, General Counsel

ADDRESS: Wiley, Rein & Fielding

1776 K Street, N.W.

Washington, D.C. 20006

TELEPHONE: 429-7330

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

May 4, 1990
Date

Nancy Marshall
Assistant Treasurer
Signature

RESPONDENT'S NAME: National Republican Congressional Cmte.

ADDRESS: 320 1st Street, S.E.

Washington, D.C. 20003

HOME PHONE: _____

BUSINESS PHONE: _____

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RESPONSE OF THE NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE TO THE INTERROGATORIES
OF THE FEDERAL ELECTION COMMISSION
IN MUR 3054

Question 1

1. With respect to all of the above contributions, provide copies of the contributions checks and all correspondence to the Ileana Ros-Lehtinen for Congress Committee with respect to these contributions.

Response

Copies of the July 29, 1989 contribution to the Special Congressional Election Fund and the August 3, 1989 contribution to the Ileana Ros-Lehtinen for Congress Committee are attached at Exhibit 1.

No check was issued to the Ros-Lehtinen Committee for the August 24, 1989 contribution to the Committee. Rather, this was an in-kind contribution in the form of a mailing to 138 individuals by the National Republican Congressional Committee ("NRCC").

Attached at Exhibit 2 is a copy of a check for \$5,500 to Linda Z. Cherry Consulting. The check stub shows that this check was the total of two amounts: \$5,062.10 which was treated as a coordinated expenditure on behalf of the Ros-Lehtinen campaign; and \$437.90 which was an in-kind contribution to the Ros-Lehtinen campaign.

Finally, attached at Exhibit 3 is a copy of all correspondence with respect to these contributions.

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Question 2

2. With respect to the \$5,000 contribution to the Special Congressional Election Fund, state the date this contribution was delivered to the committee or, if mailed, the date of mailing or postmark. State whether the NRCC was aware at the time it made this contribution that the Special Congressional Election Fund was established with the intention of its becoming an authorized committee of Ileana Ros-Lehtinen with respect to the special election on August 29, 1989.

Response

The check to the Special Congressional Election Fund was issued by the NRCC on July 25, 1989. We have no correspondence indicating the date this contribution was delivered to the Committee, mailed, or postmarked.

At the time this contribution was made, the NRCC was aware that the Special Congressional Election Fund was operating as a principal campaign committee pursuant to Advisory Opinion 1977-16, and was to become the authorized campaign committee of the eventual nominee of the Republican Party with respect to the August 29, 1989 special election in Florida.

Question 3

3. State whether the Republican National Committee and the Republican Party of Florida authorized the NRCC to make Section 441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of each such authorization.

Response

Both the Republican National Committee and the Republican Party of Florida authorized the NRCC to make

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expenditures pursuant to 2 U.S.C. § 441a(d)(3). Copies of these letters are attached at Exhibit 4.

The above statements are true to the best of my knowledge and belief.

Nancy Marshall
Nancy Marshall
Assistant Treasurer

Washington, D.C.

Subscribed to and sworn before me this 11th day of MAY, 1990.

Roberta L. Barber
Notary Public

My Commission Expires: 1-31-93

92040894385

VENDOR NUMBER

NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE

CHECK NUMBER

S220001

0A-044194

INVOICE DATE	INVOICE NO.	BATCH - VOUCHER	GROSS AMOUNT	DISCOUNT AMT.	NET AMOUNT
07/25/89	15-15	09-95-10001	5,000.00	.00	5,000.00
			SPECIAL PRIMARY ELECTION CONTRIBUTION		
DETACH AND RETAIN STATEMENT		TOTALS ▶	5,000.00	.00	5,000.00

VENDOR NUMBER

CHECK NUMBER

S22C001

44194 0A-044194 ⁶⁸⁻⁴²⁴/₅₆₀ 5

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE • CONGRESSMAN GUY VANDER JAGT, CHAIRMAN
 320 FIRST STREET S.E.
 WASHINGTON, D.C. 20003
 (202) 479-7040

DATE

07/25/89

CHECK AMOUNT

\$5,000.00**

FIRST AMERICAN BANK OF VIRGINIA
MCLEAN, VIRGINIA

PAY TO
THE ORDER
OF

THE SPECIAL CONGRESSIONAL ELECTION FUND
 TREAS: AL CARDENAS
 1221 BRICKELL AVE., 22ND FLOOR
 MIAMI, FL 33139

NON-NEGOTIABLE



9 2 0 4 0 3 9 4 3 8 6

VENDOR NUMBER

NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE

CHECK NUMBER

INVOICE DATE	INVOICE NO.	CH - VOUCHER	GROSS AMOUNT	OUNT AMT.	NET AMOUNT
DETACH AND RETAIN STATEMENT		TOTALS ▶	4,500.00		

VENDOR NUMBER

01-4152001

CHECK NUMBER

44305

68-424
500 50

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE • CONGRESSMAN GUY VANDER JAGT, CHAIRMAN
 320 FIRST STREET S.E.
 WASHINGTON, D.C. 20003
 (202) 479-7040

DATE

08/11/79

CHECK AMOUNT

4,500.00

PAY TO THE ORDER OF
 OF
 ILEANA ROS-LEHTINEN FOR
 CONGRESS
 TREAS: RICK TOMKINS
 401 MIRACLE MILK, #107
 CENTRAL GABLES, FL 33134

FIRST AMERICAN BANK OF VIRGINIA
 MCLEAN, VIRGINIA

NON-NEGOTIABLE

9 2 0 4 0 8 9 4 8 3 7



VENDOR NUMBER

NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE

CHECK NUMBER

LIND001

044458

INVOICE DATE	INVOICE NO.	BATCH - VOUCHER	GROSS AMOUNT	DISCOUNT AMT.	NET AMOUNT
08/28/89	35-250	001	5,502.10		5,502.10
06/28/89	25-249	002	137.00		137.00
TELEMARKETING					
DETACH AND RETAIN STATEMENT			TOTALS ▶		
			5,500.00	.00	5,500.00

VENDOR NUMBER

CHECK NUMBER

LIND001

44458

0A-044458

88-424
860

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE • CONGRESSMAN GUY VANDER JAGT, CHAIRMAN
320 FIRST STREET S.E.
WASHINGTON, D.C. 20003
(202) 478-7040

DATE

08/28/89

CHECK AMOUNT

\$5,500.00

PAY TO
THE ORDER
OF

LINDA Z. CHERRY CONSULTING
P.O. BOX 1325
GAINESVILLE, FLORIDA 32602

FIRST AMERICAN BANK OF VIRGINIA
FARMER, VIRGINIA

NON-NEGOTIABLE



3
January 25, 1989

National Republican Congressional
Committee
320 1st Street S.E.
Washington D.C. 20003

Dear Sirs:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you have made excessive contributions to her campaign. Specifically, you made a \$5,000 contribution on 8/8/89 to the Special Congressional Election Fund which became an authorized committee of the Ileana Ros Lehtinen for Congress on 8/23/89. You have also contributed \$4,500 to the Ileana Ros Lehtinen for Congress on 8/7/89. Because of the Special Congressional Election Fund became a committee of the campaign, your total contribution to the campaign is therefore \$9,500 which is \$4,500 more than what is permitted by federal law for a general election cycle.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$4,500 can be used to retire campaign debts or be considered as a contribution to her reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Musgrove at (305) 262-1800.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

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GUY VANDER JAGT, M.C.
CHAIRMAN

EDWARD J. ROLLINS
CO-CHAIRMAN

R. MARC NUTTLE
EXECUTIVE DIRECTOR



320 FIRST STREET, S.E.
WASHINGTON, D.C. 20003

202-479-7000

**NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE**

March 21, 1990

Mr. Richard Tonkinson
401 Miracle Mile
Coral Gables, Florida 33134

Dear Mr. Tonkinson:

I am responding to your letter, dated January 25, 1990 regarding contributions from the National Republican Congressional Committee (N.R.C.C.) to the Ros-Lehtinen campaign.

You requested that the NRCC redesignate one of its contributions to the Ros-Lehtinen Committee in order to comply with the federal contributions limits. Both N.R.C.C. contributions were reported by your committee for the general election. Redesignation should not be necessary. Instead, you need to amend your report to accurately reflect the NRCC contributions. The N.R.C.C. made a contribution on July 25th, 1989 to the Special Congressional Election Fund. This date is prior to the primary which occurred on August 1st. Please note that at 11 CFR, section 110.(1)(4), a contribution is deemed made on the date the contributor relinquishes control. The N.R.C.C. relinquished control prior to August 1st.

The N.R.C.C.'s records reflect the \$5,000.00 contribution to the Special Congressional Election Fund as a primary contribution. This was the intent of the N.R.C.C. Please amend your records accordingly.

Sincerely,

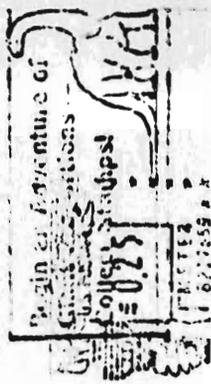
D. Stephen Edwards
Chief Legal Counsel

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NATIONAL REPUBLICAN
CONGRESSIONAL COMMITTEE
320 FIRST STREET, S.E.
WASHINGTON, D.C. 20005



RETURNED TO SENDER
REASON CHECKED
Undelivered
Address not known
Incorrect address
No such street
No such office in city
Do not re-mail in this envelope



~~Mr. Richard Tomblinson~~
~~#401 Mirade Ave~~
~~Coral Gables, Florida 33134~~



Republican
National
Committee

Lee Atwater
Chairman

August 3, 1989

The Honorable Guy Vander Jagt, Chairman
National Republican Congressional Committee
320 First Street, SE
Washington, D.C. 20003

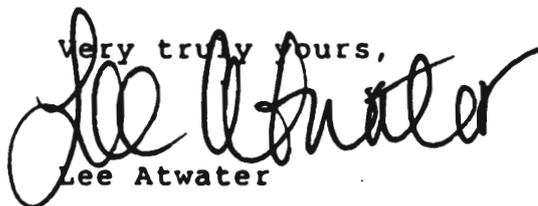
Dear Guy:

By this letter the Republican National Committee authorizes the National Republican Congressional Committee to serve as the agent of the Republican National Committee for the purpose of making expenditures pursuant to 2 U.S.C. Section 441a(d)(3). Your committee is authorized to make these expenditures on behalf of the Republican National Committee in connection with the special election of Ileana Ros-Lehtinen in District Eighteen in Florida.

Under Section 441a(d)(3) you may spend, on the Republican National Committee's behalf, \$23,990.00 for Ileana Ros-Lehtinen.

Best personal regards.

Very truly yours,



Lee Atwater

cc: Norm Cummings
Mary Matalin
Jay Banning
Ben Ginsberg
Ed Rollins
Anne Stanley
Chris Henick
Lauren Zanca



The
Emerging Majority

719 N. Calhoun
P.O. Box 311
Tallahassee, Florida
32302
Bus. (904) 222-7920
Fax. (904) 681-0184

Van B. Poole
Chairman

Chester Clem
Vice Chairman

Ida Jackson
Secretary

D.D. Biggs
Treasurer

Ginny Dinkins
Assistant
Secretary

John Laurent
Assistant
Treasurer

Committeewoman

Maryanne Morse
National
Committeewoman

August 3, 1989

The Honorable Guy Vander Jagt
Chairman
National Republican Congressional
Committee
320 First Street, S.E.
Washington, DC 20003

Dear Congressman Vander Jagt:

By this letter the Republican Party of Florida authorizes the National Republican Congressional Committee to serve as the agent of the Republican Party of Florida for the purpose of making coordinated expenditures pursuant to 2 U.S.C. 441A (d)(3).

Your Committee is authorized to make these expenditures on behalf of the Republican Party of Florida in connection with the general special election campaign of Ileana Ros-Lehtinen, District 18.

Under 441a (d)(3) you may spend, on behalf of the Republican Party of Florida \$23,990.00 for Ileana Ros-Lehtinen.

Sincerely,

Van B. Poole
Chairman

VBP/kw

0606232

WILEY, REIN & FIELDING

1776 K STREET, N. W.
WASHINGTON, D. C. 20006
(202) 429-7000

JAN WITOLD BARAN
(202) 429-7330

May 14, 1990

FACSIMILE
(202) 429-7049
TELEX 248349 WYRN UR

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20463

Attn: Jeffrey D. Long

Re: MUR 3054 (Republican Party of
Florida and Shirlee Bowne, as
Treasurer)

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 MAY 14 PM 3:16

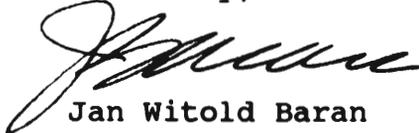
Dear Mr. Noble:

This office represents the Republican Party of Florida and Shirlee Bowne, as Treasurer ("Respondents") in the above-captioned matter. An executed Statement of Designation of Counsel is attached hereto.

This Response is submitted on behalf of Respondents in reply to the Interrogatories and Request for Documents issued by the Federal Election Commission to the Republican Party of Florida on April 26, 1990.

Enclosed are the sworn answers to these Interrogatories and Requests, along with their corresponding Exhibits.

Sincerely,


Jan Witold Baran

Enclosure

cc: Shirlee Bowne
Will McKinley

92040894394

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3054

NAME OF COUNSEL: Jan W. Baran

ADDRESS: Wiley, Rein & Fielding

1776 K Street, N.W.

Washington, D.C. 20006

TELEPHONE: 429-7330

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

5-8-90
Date

Shirlee Bowne
Signature

RESPONDENT'S NAME: Shirlee Bowne

ADDRESS: Republican Party of Florida

719 N. Calhoun St.

Tallahassee, Fl. 32303

HOME PHONE: _____

BUSINESS PHONE: 904/222-7920

92040894895

RESPONSE OF THE REPUBLICAN PARTY OF FLORIDA
TO THE INTERROGATORIES OF THE FEDERAL ELECTION COMMISSION
IN MUR 3054

Question 1

1. With respect to each of the above contributions, provide copies of the contributions checks and all correspondence to the Ileana Ros-Lehtinen for Congress Committee with respect to these contributions.

Response

Attached are copies of the two checks issued to the Ileana Ros-Lehtinen campaign. The first check was issued on August 7, 1989 and was designated for the general election campaign. The second check was issued on August 9, 1989 per request of the Ros-Lehtinen campaign and constituted a contribution toward their primary debt which the campaign's letter of August 5, 1989 indicates it had. This information regarding the Republican Party of Florida's having made a contribution to help defray the Ros-Lehtinen's primary debt, as well as the Party's contribution to the general election was relayed to the campaign a second time, on February 14, 1990, upon its request. Attachment 1.

Question 2

2. State whether the Republican Party of Florida authorized the NRCC to make Section 441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of such authorization.

Response

Yes. See Authorization letter at Attachment 2.

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Question 3

3. State whether the Republican Party of Florida has transferred funds to the Republican Party of Dade County in 1987, 1988, and 1989. If so, provide a schedule of the dates and amounts of all such transfers, whether or not made to the federal or nonfederal accounts of the Republican Party of Dade County.

Response

The records of the Republican Party of Florida Federal Campaign Committee indicate that it made no transfers to the Republican Party of Dade County in 1987, 1988 or 1989.

The Republican Party of Florida non-federal account issued the following checks to the Republican Party of Dade County non-federal account during 1987, 1988, and 1989:

2/13/87	\$10.00
2/13/87	\$10.00
3/16/88	\$10.00
6/21/88	\$1000.00
9/26/88	\$817.20
5/1/89	\$50.00
6/20/89	\$1000.00

Question 4

4. State whether the Republican Party of Florida has requested or suggested to the Republican Party of Dade County that it make specific contributions to federal, state, or local candidates or has been consulted or worked in concert or cooperation with the Republican Party of Dade County in the making of any contributions to federal, state, or local candidates.

Response

To my knowledge, the Republican Party of Florida Federal Campaign Committee has not requested or suggested to the Republican Party of Dade County that it make specific contributions to federal, state, or local candidates, nor has

9 2 0 4 0 8 9 4 3 9 7

the Republican Party of Florida worked in concert or cooperation with the Republican Party of Dade County in making of any contributions to federal, state or local candidates.

Question 5

5. State whether the Republican Party of Florida recognizes the Republican Party of Dade County as an affiliated organization. If so, provide the basis for such recognition, including party rules or by-laws and state law.

Response

No, the Republican Party of Florida does not recognize the Republican Party of Dade County as an affiliated organization.

The above statements are true to the best of my knowledge and belief.


Shirlee Bowne
Treasurer

Tallahassee, Florida

Subscribed to and sworn before me this 11 day of May, 1990.


Notary Public

My Commission Expires: Notary Public, State of Florida
My Commission Expires May 24, 1991
Bonded thru Troy Fair - Insurance Inc.

92040894338

00279

REPUBLICAN PARTY OF FLORIDA



ACCOUNT NO.

DATE

INVOICE

AMOUNT

8/7/89

CONTRIBUTION - GENERAL ELECTION

TOTAL \$4,500.00

SOUTHEAST BANK OF TALLAHASSEE, FL
101 N. MONROE ST.
TALLAHASSEE, FL 32301

00279



REPUBLICAN PARTY OF FLORIDA

FEDERAL CAMPAIGN COMMITTEE

P.O. BOX 311

TALLAHASSEE, FLORIDA 32302

DATE 8/7/89

FOUR THOUSAND FIVE HUNDRED AND 00/100

AMOUNT

PAY TO THE ORDER OF

ROS LEHTINEN CAMPAIGN
401 MIRACLE MILE
SUITE 107
CORAL GABLES, FL 33134

\$4,500.00

Will T. Maffey
Barbara S. Maffey
NON NEGOTIABLE
AUTHORIZED SIGNATURE

000279 0631127570

248 2010550

ILEANA ROS-LEHTINEN
FOR CONGRESS

August 5, 1989

The Honorable Van B. Poole, Chairman
Republican Party of Florida
719 North Calhoun
P.O. Box 311
Tallahassee, Florida 32302

Dear Chairman Poole:

Thank you very much for your offers to help Senator Ileana Ros-Lehtinen in her quest for the first Republican Congressional seat in Miami, Florida.

By this letter the Ileana Ros-Lehtinen Campaign for Congress campaign formally requests a \$5,000 contribution to help fund our Primary Debt.

Senator Ros-Lehtinen has proved herself with years of service to our Party, as you well know from your service with her in Florida's legislature.

Ileana Ros-Lehtinen just received an outstanding 83% of the Republican vote in the Primary on August 1st.

We know that she will make all Republicans proud.

Thank you for all your help.

Sincerely,

Rick Tonkinson

Rick Tonkinson
Treasurer
Ros-Lehtinen for Congress Campaign

RT/dlm

92040894900



The
Emerging Majority

719 N. Calhoun
P.O. Box 311
Tallahassee, Florida
32302
Bus. (904) 222-7920
Fax. (904) 681-0184

Van B. Poole
Chairman

Chester Clem
Vice Chairman

Ida Jackson
Secretary

D.D. Biggs
Treasurer

Ginny Dinkins
Assistant
Secretary

John Laurent
Assistant
Treasurer

Bill Taylor
National
Committeeman

Maryanne Morse
National
Committeewoman

August 9, 1989

The Honorable Ileana Ros-Lehtinen
401 Miracle Mile
Suite 107
Coral Gables, FL 33134

Dear Ileana:

Enclosed please find a check in the amount of \$5,000, per
your recent request.

I would appreciate if you would write a formal request
for this for our files.

If there is anything else that we can do for you, please
do not hesitate to contact me.

Sincerely,

Van B. Poole
Chairman

VBP/cfl

enclosure

b. 11#

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January 25, 1989

Republican Party of Florida
P.O. Box 311
Tallahassee, Florida 32302

Dear Sirs:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you have made excessive contributions to her campaign. Specifically you made \$4,500 contribution on 8/9/89 and a \$5,000 on 8/11/89 you contributed \$5,000. Therefore the total contribution to the general election cycle is \$10,000 which is \$5,000 more than what is permitted by federal law.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$5,000 can be used to retire campaign debts or be considered as a contribution to her reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Musgrove at (305) 262-1800.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

92040894903

SCHEDULE A

ITEM RECEIPTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 1 OF 1
FOR LINE NUMBER 116

CONTRIBUTIONS FROM PARTY COMMITTEES

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen For Congress C00236976

X**

9204089490*

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
National Republican Congressional Committee 620 First Street S.E. Washington D.C. 20003 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		8-7-89	\$ 4,500.00
B. Full Name, Mailing Address and ZIP Code Special Congressional Fund 1221 Brickell Avenue MIAMI, FL 33131 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		8-7-89	\$ 19,000.00
C. Full Name, Mailing Address and ZIP Code Republican National Committee 310 First Street S.E. Washington D.C. 20003 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		8-7-89	\$ 5000.00
D. Full Name, Mailing Address and ZIP Code Republican Party of Florida P.O. Box 311 Tallahassee, FL. 32302 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):		8-9-89	\$ 4500.00
E. Full Name, Mailing Address and ZIP Code			
F. Full Name, Mailing Address and ZIP Code			
G. Full Name, Mailing Address and ZIP Code			

SUBTOTAL of Receipts This Page (optional)	\$ 33,000.00
TOTAL This Period (last page this line number only)	\$ 33,000.00

CHEDULE A

ITEMIZED RECEIPTS

Use this schedule for each category of the Detailed Summary Page

PAGE 2 OF 2
FOR LINE NUMBER 11 b

POLITICAL PARTY COMMITTEES

Information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros - Lehtinen for Congress

92040894905

* A. Full Name, Mailing Address and ZIP Code Republican Party of Florida P.O. Box 311 Tallahassee, FL 32302 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year) 8-11-89	Amount of Each Receipt this Period \$5000.00
B. Full Name, Mailing Address and ZIP Code Special Congressional Election Fund 1221 Buckell Avenue MIAMI, FL 33131 Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$ 22,600	Date (month, day, year) 8-16-89	Amount of Each Receipt this Period \$3,600.00
C. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
D. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
E. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
F. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period
G. Full Name, Mailing Address and ZIP Code Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Name of Employer Occupation Aggregate Year-to-Date > \$	Date (month, day, year)	Amount of Each Receipt this Period

SUBTOTAL of Receipts This Page (optional)	\$8,600.00
TOTAL This Period (last page this line number only)	\$35,600.00



Van B. Poole
Chairman

Sherry Pymale
Vice Chairman

Ida Jackson
Secretary

Shirlee Bawne
Treasurer

Ginny Dinkins
Assistant
Secretary

John Laurent
Assistant
Treasurer

Chester Clem
National
Committeeman

Maryanne Morse
National
Committeewoman

February 14, 1990

Ms. Debbie Musgrove
c/o Congressman Ileana Ros-Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

Dear Debbie:

This letter is to follow up our telephone conversation of last Friday, regarding the reporting of two Republican Party of Florida contributions to the Congressman's campaign.

I have enclosed copies of correspondence dealing with the \$5000.00 contribution to help fund the Primary debt.

Also, please find a copy of the \$4500.00 check which was a contribution to the General Election.

Your report shows that both checks were reported as general election contributions. You should amend your report to show the \$4500.00 check as a contribution to the Primary.

If you have any further questions regarding this matter, please feel free to call.

Sincerely,

Barbara S. Morrison
Deputy Executive Director

Enclosures

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Republican Party of Florida - Federal Campaign Committee

A. Full Name, Mailing Address and ZIP Code Ros-Lehtinen Campaign 401 Miracle Mile, Suite 107 Coral Gables, Fl. 33134	Purpose of Disbursement Campaign Contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 8/7/89	Amount of Each Disbursement This Period 4,500.00
B. Full Name, Mailing Address and ZIP Code Ros-Lehtinen Campaign 401 Miracle Mile, Suite 107 Coral Gables, Florida 33134	Purpose of Disbursement Campaign Contribution Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year) 8/9/89	Amount of Each Disbursement This Period 5,000.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

9,500.00

92040894907



The Emerging Majority

719 N. Calhoun
P.O. Box 311
Tallahassee, Florida
32302
Bus. (904) 222-7920
Fax. (904) 681-0184

Van E. Poole
Chairman

Chester Clem
Vice Chairman

Ida Jackson
Secretary

D.D. Biggs
Treasurer

Jimmy Dinkins
Assistant
Secretary

John Laurent
Assistant
Treasurer

A. Taylor
Assistant
Clerk

Maryanne Merse
National
Committeewoman

August 3, 1989

The Honorable Guy Vander Jagt
Chairman
National Republican Congressional
Committee
320 First Street, S.E.
Washington, DC 20003

Dear Congressman Vander Jagt:

By this letter the Republican Party of Florida authorizes the National Republican Congressional Committee to serve as the agent of the Republican Party of Florida for the purpose of making coordinated expenditures pursuant to 2 U.S.C. 441A (d)(3).

Your Committee is authorized to make these expenditures on behalf of the Republican Party of Florida in connection with the general special election campaign of Ileana Ros-Lehtinen, District 18.

Under 441a (d)(3) you may spend, on behalf of the Republican Party of Florida \$23,990.00 for Ileana Ros-Lehtinen.

Sincerely,

~~Van E. Poole~~
Chairman

VBP/kw



**Republican
National
Committee**

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
J. Courtney Cunningham
Deputy Chief Counsels

May 10, 1990

Lee Ann Elliott, Chairman
Federal Election Commission
Washington, D.C. 20463

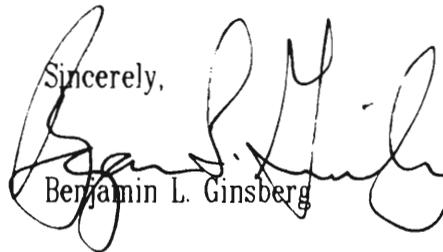
RE: MUR 3054
Republican National Committee
and William J. McManus, as treasurer

Dear Chairman Elliot:

We are in receipt of the Commission's April 26, 1990 letter finding reason to believe that the Republican National Committee violated 2 U.S.C. 434(b) and 441a, provisions of the Federal Election Campaign Act. We believe we will be able to demonstrate that no action should be taken against the Committee or its Treasurer. However, in order to properly respond, we respectfully request an extension of time in this matter for ten days.

Such an extension would make our response due on May 21, 1990. Thank you for your consideration.

Sincerely,


Benjamin L. Ginsberg

cc: Jeffrey D. Long

99-6219
RECEIVED
FEDERAL ELECTION COMMISSION
ADMINISTRATIVE DIVISION
90 MAY 11 PM 3:51

RECEIVED
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OFFICE OF FEDERAL COUNSEL
90 MAY 14 PM 3:11

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 15, 1990

Benjamin L. Ginsberg
Chief Counsel
Republican National Committee
Dwight D. Eisenhower Republican Center
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3054
Republican National Committee
and William J. McManus, as
treasurer

Dear Mr. Ginsberg:

This is in response to your letter dated May 10, 1990, which we received on May 14, 1990, requesting an extension of 10 days to respond to the Commission's inquiry. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on May 25, 1990.

If you have any questions, please contact Jeff Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel


BY: George F. Rishel
Assistant General Counsel

92040894910

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARIAT

006 6257

90 MAY 16 11:53

**DAVID W. SOUTHWELL
16857 N. W. 57th AVENUE
MIAMI, FLORIDA 33055**

May 11th, 1990

**Ms. Lee Ann Elliott, Chairman
Federal Election Commission
909 E. Street, N.W.
Washington, D.C. 20463**

Dear Ms. Elliott:

RE: MUR 3064

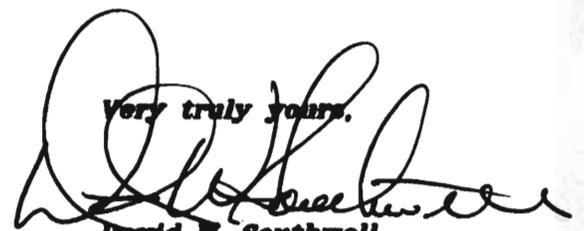
Enclosed is the original of your letter dated April 26, 1990 concerning MUR 3064. I received this just a few days ago as I had been out of the State when it was received in the Party offices. I am returning it to you because it should not have been sent to me, even though I am the Treasurer.

I was the Treasurer of the Republican Party of Dade County on the date(s) when money was disbursed by the Party with respect to the campaign of Ms. Res-Lehtinen. The disbursements which gave rise to your complaint were made without my knowledge or consent. You should address your complaint to the individuals who were responsible for the subject action. Those individuals are Maria Alonso-Martinez, Party Chairman, Al Cardenas, Finance Chairman, and Mary Collins, Committee Chairman.

On November 2, 1989, I filed a formal complaint with the FEC regarding the actions of the above named individuals, which actions included the disbursements which are the subject of MUR 3064. The FEC has failed to act in an expeditious manner regarding the complaint filed November 2, 1989, and the matter is still pending.

Please remove my name from this complaint, immediately!

Very truly yours,



**David W. Southwell
Treasurer**

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 MAY 16 PM 4:32

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 26, 1990

David W. Southwell, Treasurer
Republican Party of Dade County
2905 Salzedo Street
Coral Gables, FL 33134

RE: MUR 3054
Republican Party of Dade
County and David W. Southwell,
as treasurer

Dear Mr. Southwell:

On April 19, 1990, the Federal Election Commission found that there is reason to believe the Republican Party of Dade County ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee and you, as treasurer. You may submit any factual or legal materials that you believe are relevant to the Commission's consideration of this matter. Please submit such materials to the General Counsel's Office along with answers to the enclosed questions within 15 days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information demonstrating that no further action should be taken against the Committee and you, as treasurer, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation.

If you are interested in pursuing pre-probable cause conciliation, you should so request in writing. See 11 C.F.R. § 111.18(d). Upon receipt of the request, the Office of the General Counsel will make recommendations to the Commission either proposing an agreement in settlement of the matter or recommending declining that pre-probable cause conciliation be pursued. The Office of the General Counsel may recommend that pre-probable cause conciliation not be entered into at this time so that it may complete its investigation of the matter.

92040894912

David W. Southwell
Page 2

Further, the Commission will not entertain requests for pre-probable cause conciliation after briefs on probable cause have been mailed to the respondent.

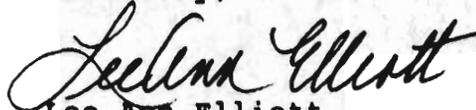
Requests for extensions of time will not be routinely granted. Requests must be made in writing at least five days prior to the due date of the response and specific good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address, and telephone number of such counsel, and authorizing such counsel to receive any notifications and other communications from the Commission.

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

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,


Lee Ann Elliott
Chairman

Enclosures
Factual and Legal Analysis
Procedures
Designation of Counsel Form
Interrogatories and Request for documents

92040894913

FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Republican Party of Dade County MUR 3054
and David W. Southwell, as
treasurer

This matter was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Ileana Ros-Lehtinen for Congress Committee ("the Ros-Lehtinen Committee") was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989. The Special Congressional Election Fund began operation in July 1989 with the intention of eventually becoming an authorized committee of the candidate who won the special primary. It became an authorized committee of Ileana Ros-Lehtinen on August 23, 1989, the date of the amended Statements of Candidacy and Organization.

The Ros-Lehtinen Committee raised \$1,053,638 and spent \$1,052,562 with respect to the 1989 special elections and ended the year with cash on hand of \$1,086 and no debts outstanding. It filed four reports covering the period from June 6, 1989, to December 31, 1989. For each of those reporting periods, the committee reported a surplus of cash on hand over outstanding debts. Thus, the reports indicate that the Committee did not

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have net debts outstanding from either the special primary election or the special general election. The committee has not yet terminated. The Special Congressional Election Fund raised and spent \$22,600 in 1989 and filed one report covering the period from July 14, 1989, to November 18, 1989, which was designated as a termination report. All of its receipts came from contributions from party committees or the principal campaign committees of Members of Congress, and its funds were all transferred to the Ros-Lehtinen Committee on August 7th and August 16th before Ms. Ros-Lehtinen designated it as an authorized committee.¹

Excessive Contributions

The Act provides that any person may contribute an aggregate of \$1,000 with respect to any election to a candidate for federal office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441(a)(2)(A). A political committee may not knowingly accept a contribution in excess of these limitations. 2 U.S.C. § 441a(f). Commission regulations explain that an undesignated contribution is considered as made with respect to the next election. A designated contribution is considered made for the election

1. By transferring all of its funds to the principal campaign committee, the Fund became an affiliated committee of the principal campaign committee pursuant to 11 C.F.R. § 110.3(a)(1)(iii)(E) and, thus, shared a single contribution limitation for contributions received by the two committees from the same contributor. This shared limit applied even if it had not later been designated an authorized committee.

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designated, unless it is made after the designated election, in which case it can be made only if the campaign has net debts outstanding from the earlier election. 11 C.F.R. §§ 110.1(b) and 110.2(b)(3). The regulations also define net debts outstanding and provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. Id. Commission reporting forms provide for committees that make or receive contributions to indicate the election for which each contribution is made or received. See 11 C.F.R. § 104.2.

The reports filed by the Republican Party of Florida designated its August 9th \$5,000 contribution as made for the special primary election and an August 7th \$4,500 contribution for the special general election (they were reported as received on the 9th and 11th respectively). The special primary election contribution, however, was made after the August 1, 1989, special primary, and the Ros-Lehtinen Committee's reports indicate that it did not have net debts outstanding with respect to the special primary. In addition, the Ros-Lehtinen Committee also received a \$5,000 contribution from the Republican Party of Dade County on August 11, 1989. Under Commission regulations, all contributions made by a state party committee and all subordinate state party committees, including local county committees, are presumed made by one committee. 11 C.F.R. § 110.3(b)(2)(ii). In the absence of evidence to rebut the presumption, the amount of the contribution by the Republican Party of Dade County should be added to those by the Republican Party of Florida, resulting in

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the making of an aggregate excessive contribution.

In the period from July 1, 1989, to September 18, 1989, the Republican Party of Dade County had total receipts of \$8,745 of which \$7,000 was reported as a contribution from the RNC. In addition to the \$5,000 direct contribution to the Ros-Lehtinen Committee, the Republican Party of Dade County also made \$4,747.74 in coordinated party expenditures pursuant to 2 U.S.C. § 441a(d) on August 25th on behalf of Ileana Ros-Lehtinen. In a February 19, 1990, letter to RAD, the treasurer of the Republican Party of Dade County stated that it had been authorized by the RNC to make the coordinated expenditures and had received the \$7,000 for that purpose. The Republican Party of Dade County also reported making \$8,820.00 in GOTV disbursements on August 24th and 25th. In the same February 19, 1990, letter, the treasurer stated that the radio spots "were not made on behalf of any specific candidate." He said that there was a special state election at the same time as the special federal election and that the ads were designed to encourage Republicans to vote. He said the federal account was used to pay for them because of the special federal election and because that's where the money was. These circumstances indicate that there may be additional excessive contributions depending upon the validity of the coordinated party expenditures and the exempt payments.

Therefore, there is reason to believe the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.

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**DESCRIPTION OF PRELIMINARY PROCEDURES
FOR PROCESSING POSSIBLE VIOLATIONS DISCOVERED BY THE
FEDERAL ELECTION COMMISSION**

Possible violations discovered during the normal course of the Commission's supervisory responsibilities shall be referred to the Enforcement Division of the Office of the General Counsel where they are assigned to a staff member.

Following review of the information which generated the matter, a recommendation on how to proceed, based on a preliminary legal and factual analysis, shall be submitted to the Commission. This initial report shall recommend either: (a) that the Commission find reason to believe that a possible violation of the Federal Election Campaign Act of 1971, as amended (hereinafter "the Act") may have occurred or is about to occur; or (b) that the Commission find no reason to believe that a possible violation of the Act has occurred or is about to occur, and that the Commission close the file in the matter.

Thereafter, if the Commission decides by an affirmative vote of four Commissioners to open a Matter Under Review (MUR) and finds that there is reason to believe that a violation of the Act has been committed or is about to be committed, the Office of the General Counsel shall conduct an investigation into the matter. Within 15 days of notification of the Commission's finding(s), a respondent(s) may submit any factual or legal materials relevant to the allegations. During its investigation, the Commission shall have the power to subpoena documents, to subpoena individuals to appear for depositions, and to order written answers to interrogatories. The respondent(s) may be contacted more than once by the Commission during its investigation.

If, during this period of investigation, the respondent(s) indicate a desire to enter into conciliation, the Office of the General Counsel may recommend that the Commission enter into conciliation prior to a finding of probable cause to believe a violation has been committed. Conciliation is an attempt to correct or prevent a violation of the Act by informal methods of conference and persuasion. Most often, the result of conciliation is a agreement signed by the Commission and the respondent(s). The Conciliation Agreement must be adopted by four votes of the Commission before it becomes final. After signature by the Commission and the respondent(s), the Commission shall make public the Conciliation Agreement.

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STATEMENT OF DESIGNATION OF COUNSEL

MUR _____

NAME OF COUNSEL: _____

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and other
communications from the Commission and to act on my behalf before
the Commission.

Date

Signature

RESPONDENT'S NAME: _____

ADDRESS: _____

HOME PHONE: _____

BUSINESS PHONE: _____

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
)
)

MUR 3054

**INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS**

TO: David W. Southwell, Treasurer
Republican Party of Dade County
2905 Salzedo Street
Coral Gables, FL 33134

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

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INSTRUCTIONS

In answering these interrogatories and request for production of documents, furnish all documents and other information, however obtained, including hearsay, that is in possession of, known by or otherwise available to you, including documents and information appearing in your records.

Each answer is to be given separately and independently, and unless specifically stated in the particular discovery request, no answer shall be given solely by reference either to another answer or to an exhibit attached to your response.

The response to each interrogatory propounded herein shall set forth separately the identification of each person capable of furnishing testimony concerning the response given, denoting separately those individuals who provided informational, documentary or other input, and those who assisted in drafting the interrogatory response.

If you cannot answer the following interrogatories in full after exercising due diligence to secure the full information to do so, answer to the extent possible and indicate your inability to answer the remainder, stating whatever information or knowledge you have concerning the unanswered portion and detailing what you did in attempting to secure the unknown information.

Should you claim a privilege with respect to any documents, communications, or other items about which information is requested by any of the following interrogatories and requests for production of documents, describe such items in sufficient detail to provide justification for the claim. Each claim of privilege must specify in detail all the grounds on which it rests.

Unless otherwise indicated, the discovery request shall refer to the time period from January 1, 1987, to the present.

The following interrogatories and requests for production of documents are continuing in nature so as to require you to file supplementary responses or amendments during the course of this investigation if you obtain further or different information prior to or during the pendency of this matter. Include in any supplemental answers the date upon which and the manner in which such further or different information came to your attention.

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DEFINITIONS

For the purpose of these discovery requests, including the instructions thereto, the terms listed below are defined as follows:

"You" shall mean the named respondent in this action to whom these discovery requests are addressed, including all officers, employees, agents or attorneys thereof.

"Persons" shall be deemed to include both singular and plural, and shall mean any natural person, partnership, committee, association, corporation, or any other type of organization or entity.

"Document" shall mean the original and all non-identical copies, including drafts, of all papers and records of every type in your possession, custody, or control, or known by you to exist. The term document includes, but is not limited to books, letters, contracts, notes, diaries, log sheets, records of telephone communications, transcripts, vouchers, accounting statements, ledgers, checks, money orders or other commercial paper, telegrams, telexes, pamphlets, circulars, leaflets, reports, memoranda, correspondence, surveys, tabulations, audio and video recordings, drawings, photographs, graphs, charts, diagrams, lists, computer print-outs, and all other writings and other data compilations from which information can be obtained.

"Identify" with respect to a document shall mean state the nature or type of document (e.g., letter, memorandum), the date, if any, appearing thereon, the date on which the document was prepared, the title of the document, the general subject matter of the document, the location of the document, the number of pages comprising the document.

"Identify" with respect to a person shall mean state the full name, the most recent business and residence addresses and the telephone numbers, the present occupation or position of such person, the nature of the connection or association that person has to any party in this proceeding. If the person to be identified is not a natural person, provide the legal and trade names, the address and telephone number, and the full names of both the chief executive officer and the agent designated to receive service of process for such person.

"And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of these interrogatories and requests for the production of documents any documents and materials which may otherwise be construed to be out of their scope.

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**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

Reports filed with the Federal Election Commission disclose a contribution from the Republican Party of Dade County to the Ileana Ros-Lehtinen for Congress Committee of \$5,000 on August 11, 1989.

1. With respect to the above contribution, provide copies of the contributions checks and all correspondence to the Ileana Ros-Lehtinen for Congress Committee with respect to these contributions.

2. State whether the Republican National Committee authorized the Republican Party of Dade County to make Section 441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of such authorization. State the purpose of the \$7,000 transfer on August 24, 1989, from the Republican National Committee and provide copies of all correspondence relating to that transfer.

3. State whether the Republican Party of Florida has transferred funds to the Republican Party of Dade County in 1987, 1988, and 1989. If so, provide a schedule of the dates and amounts of all such transfers, whether or not made to the federal or nonfederal accounts of the Republican Party of Dade County.

4. State whether the Republican Party of Florida has requested or suggested to the Republican Party of Dade County that it make specific contributions to federal, state, or local candidates or has been consulted or worked in concert or cooperation with the Republican Party of Dade County in the making of any contributions to federal, state, or local candidates.

5. State whether the Republican Party of Dade County is recognized by the Republican Party of Florida as an affiliated organization. If so, provide the basis for such recognition, including party rules or by-laws and state law.

6. Provide copies of all scripts used for the radio advertisements represented by the \$8,820 in disbursements for get-out-the-vote activities in August 1989. Identify all other elections or offices to be voted on at the August 29th special election in Dade County.

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**Republican
National
Committee**

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
Janice P. Lacy
Deputy Chief Counsels

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 MAY 25 AM 11:02

OGC 633a

May 24, 1990

Lawrence M. Noble, Esq.
General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 3054, Republican National Committee (RNC)
and William J. McManus, as Treasurer

Dear Mr. Noble:

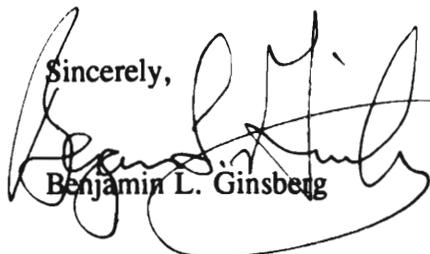
As we discussed today with Dan Blessington and Jeff Long, the RNC respectfully requests an additional extension of time to June 8, 1990 to respond in the above-captioned matter.

This extension is necessary since, in order to properly respond to the reason to believe findings in this matter, we need to discuss questions raised by the Commission's legal analysis with George Rishel, who will return on June 5, 1990.

In the interim, attached are documents responsive to Question (1) of the Commission's Interrogatories and Request for Documents. The RNC will submit its complete response to the Interrogatories and Request for Documents on June 8.

Thank you for your consideration.

Sincerely,



Benjamin L. Ginsberg

BLG:ljd
Enclosure

cc: Dan Blessington
Jeff Long

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SPE030 The Special Congressional Election Fund 7/20/89 17683

SCEF0720 \$5,000.00 \$5,000.00 Contribution



Republican National Committee .

310 First Street Southeast, Washington, D.C. 20003

NW7 BANK
6350 BOONE BLVD.
VIENNA, VA. 22180

CHECK # 017683

DATE	CHECK NUMBER
7/20/89	17683

Pay exactly **5,000** dollars and 00 cents

PAY TO
THE

ORDER OF: The Special Congressional Election Fund

AMOUNT

*****5,000.00***

Pat Hays
WYOMING BANK

⑆017683⑆ ⑆056004089⑆ 651⑆7307499⑆

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VENDOR NUMBER	VENDOR NAME	CHECK DATE	CHECK NO.
ROS490	Ileana Ros-Lehtinen for Congress	8/3/89	17731

INVOICE NO	INVOICE AMOUNT	ADJUSTMENT	NET AMOUNT	EXPLANATION
IL0803	\$5,000.00		\$5,000.00	Contribution FLH018P



Republican National Committee

310 First Street Southeast, Washington, D.C. 20003

NIAGARA
8330 BOONE BLVD
VIENNA VA 22180

CHECK NO. 017731

DATE	CHECK NUMBER
8/3/89	17731

Pay exactly **5,000** dollars and zero cents

PAY TO
THE
ORDER OF

Ileana Ros-Lehtinen for Congress

AMOUNT
5,000.00
Ileana Ros-Lehtinen
WYUAE 10/13

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**Republican
National
Committee**

August 4, 1989

Mrs. Ileana Ros-Lehtinen
The Ros-Lehtinen for Congress Campaign
401 Miracle Mile
Suite 107
Coral Gables, FL 33134

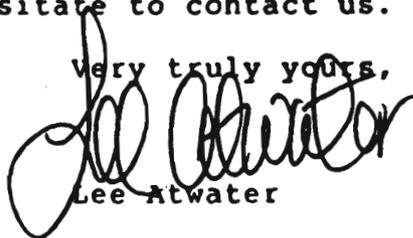
Dear Mrs. Ros-Lehtinen:

The Republican National Committee is pleased to send a check in the amount of \$5,000.00. This contribution was made at the recommendation of Southern Regional Political Director, Chris Henick and Deputy Regional Political Director Ned Monroe.

Through the commitment that you and other Republican leaders are making, I am confident that our goal of becoming the majority party will be attained. We must continue to build a strong future for the GOP.

If I or the Republican National Committee can be of further assistance, please do not hesitate to contact us.

Very truly yours,



Lee Atwater

cc: Van Poole
Bill Taylor
Maryann Morse
Maria Alonso-Martinez
Al Cardenas
Mary Collins
Jeb Bush
Norm Cummings
Chris Henick
Ned Monroe

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**Republican
National
Committee**

Jay C. Banning
Director of Administration
Comptroller

February 28, 1990

Mr. Richard Tonkinson
Congressman Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, FL 33126

Dear Mr. Tonkinson:

Thank you for your letter regarding the contributions from the Republican National Committee (RNC) to Ileana Ros Lehtinen for Congress.

Your letter indicates that the RNC made contributions to Ros Lehtinen for Congress in excess of the limits of the Federal Election Campaign Act of 1971, as amended. Your letter further stated that the RNC could designate that the excess contribution be used for campaign debt retirement or reelection. We authorize Ros Lehtinen for Congress the funds to used for debt retirement.

Thank you in advance for your cooperation. Please contact me if you have any questions or comments.

Sincerely,

Jay C. Banning
Assistant Treasurer

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 29, 1990

Benjamin L. Ginsberg
Chief Counsel
Republican National Committee
Dwight D. Eisenhower Republican Center
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3054
Republican National
Committee and William J.
McManus, as treasurer

Dear Mr. Ginsberg:

This is in response to your letter dated May 24, 1990, formally requesting an additional extension of 14 days in which to fully respond to the Commission's inquiry. As agreed, you have submitted enclosures with this letter in partial response to the Commission's discovery requests.

You have indicated that you would be better able to respond to the Commission's findings if you first had an opportunity to discuss the matter with George Rishel of this Office. As was previously mentioned to you and Ms. Lacey, the factual and legal analysis sent to you with notification of the reason to believe findings should serve as the basis for your response to those findings. Nonetheless we have no objection to granting you an additional extension, and will inform Mr. Rishel of your desire to speak with him upon his return. Accordingly, your full response is now due by the close of business on June 8, 1990.

If you have any questions, please contact Jeffrey Long of this Office at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to read "Daniel Blessington, Jr.", with a stylized flourish at the end.

BY: Daniel J. Blessington, Jr.
Senior Attorney

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HOUSE OF REPRESENTATIVES

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

99 JUN - 1 AM 10:24
HAND DELIVERED

P.O. Box 52-2784
Miami, FL 33152-2784

ILEANA ROS-LEHTINEN

May 31, 1990

Mr. Lawrence Noble
Office of General Counsel
Federal Elections Commission
999 E Street NW
Washington, DC 20463

Re: MUR 3054 Interrogatories and
Request for Documents

Dear Mr. Noble:

On behalf of the Ileana Ros-Lehtinen for Congress Committee (FEC ID #C00236976) and its Treasurer, Jose M. Martinez-Armesto I hereby respond to the Interrogatories and Request for Documents in the matter of MUR 3054.

Question 1. Identify the person who succeeded Richard Preston Tonkinson as treasurer of the Ileana Ros-Lehtinen for Congress Committee ("Committee") and state the date such person became treasurer. Identify all contributions received and expenditures made by the Committee from December 31, 1989 to the date the new treasurer was named.

Response Richard Preston Tonkinson was succeeded as Treasurer of the Ileana Ros-Lehtinen for Congress Committee on March 19, 1990, by Jose M. Martinez-Armesto. An amended Statement of Organization was signed on that date, and was received, according to the public record on file at the FEC, on March 30, 1990 (see Attachment I). However, the amended Statement of Organization is date-stamped March 29, 1990.

Between the dates of December 31, 1989 and April 2, 1990, the Committee received no contributions and made no expenditures.

Question 2. With regard to the following contributions, provide copies of the contribution checks and all correspondence that accompanied these contributions and state the date of receipt of each contribution or, if mailed, the date of mailing or postmark.

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OFFICE OF GENERAL COUNSEL

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Mr. Lawrence Noble
Page 2

Response A. Frederick W. Guardabassi. A copy of Mr. Guardabassi's check is Attachment II,1. The Committee has not found in its files any correspondence that accompanied the check, nor the envelope in which the check was sent. The check was received on August 24, 1989, and deposited in accordance with procedures established by the Ileana Ros-Lehtinen for Congress Committee (see Affidavit of Debbie Musgrove, Attachment II,2).

Mr. Guardabassi was issued a contribution refund in the amount of \$500 on May 31, 1990. A copy of this refund check is Attachment II,3.

B. Robin Kaskal (sic). This contribution of \$1,000 was mistakenly reported as an in-kind donation from Mrs. Kaskel. Neither Mr. nor Mrs. Kaskel made an in-kind donation to the Committee. A letter confirming this fact has been sent to Mr. and Mrs. Kaskel for their signatures, and will be forwarded to the Commission as soon as it is signed and returned to us. An unsigned copy is Attachment, II,4.

The Committee is preparing amended FEC reports for the period August 10, 1989 through September 18, 1989, and for the period September 19, 1989 through December 31, 1989 which will remove this in-kind contribution.

C. Alma E. Morissette. A copy of Ms. Morissette's check is Attachment II,5. The Committee has not found in its files any correspondence that accompanied the check, nor the envelope in which the check was sent. The check was received on August 25, 1989, and deposited in accordance with the Committee's procedures.

Ms. Morissette was issued a contribution refund in the amount of \$1,000 on May 31, 1990. A copy of this refund check is Attachment II,6.

D. Fernando Rodriguez. A copy of Mr. Rodriguez' check is Attachment II,7. The Committee has not found in its files any correspondence that accompanied the check, nor the envelope in which the check was sent. The check was received on August 25, 1989, and deposited in accordance with Committee procedures.

Mr. Rodriguez was issued a contribution refund in the amount of \$300 on May 31, 1990. A copy of this refund check is Attachment II,8.

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Mr. Lawrence Noble
Page 3

E. Republican Party of Florida. A copy of the check from the Republican Party of Florida in the amount of \$4,500 is Attachment II,9. A copy of the check from the Republican Party of Florida in the amount of \$5,000 is Attachment II,10.

The Committee has not found in its files any correspondence that accompanied the check for \$4,500, nor the envelope in which the check was sent. The check was received on August 9, 1989, and deposited in accordance with Committee procedures.

A copy of the letter from the Republican Party of Florida that accompanied the debt retirement check for \$5,000 is Attachment II,11. This letter indicates that this check is for debt retirement efforts relating to the primary election of August 1, 1989. The Committee has not found the envelope in which the check was sent. The check was received on August 11, 1989, and deposited in accordance with Committee procedures.

While the Legal and Factual Analysis of MUR 3054 asserts that the Committee did not show primary debt, there was in fact a campaign debt as of the close of business on August 1, 1989, the date of the special primary.

F. National Republican Congressional Committee. A copy of the check for \$4,500 made payable to the Committee is Attachment II, 12. The committee has not found in its files any correspondence that accompanied the check, nor the envelope in which the check was sent. The check was received on August 9, 1989, and deposited in accordance with Committee procedures.

A copy of the check for \$5,000, dated July 25, 1989 and made payable to the Special Election Congressional Fund, is Attachment II,13. The Committee has not found in its files any correspondence that accompanied the check, information on when the check was sent by the NRCC, the envelope in which it was sent, nor the date it was received by the Special Congressional Election Fund.

G. Republican National Committee. A copy of the check made payable to the Committee is Attachment II,14. The Committee has not found in its files any correspondence that accompanied the check, nor the envelope in which the check was sent. The check was received on August 7, 1989, and deposited in accordance with Committee procedures.

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A copy of the check for \$5,000, dated July 20, 1989 and made payable to the Special Congressional Election Fund, is Attachment II,15. The Committee has not found in its files any correspondence that accompanied the check, information on when the check was sent by the RNC, the envelope in which the check was sent, nor the date it was received by the Special Congressional Election Fund.

H. Republican Party of Dade County. A copy of the check is Attachment II,16. This check was picked up by a messenger and delivered to the Committee on August 11, 1989, and was not accompanied by any correspondence. It was deposited in accordance with Committee procedures.

Question 3. Provide copies of all documents relating to the Special Congressional Election Fund and its designation as an authorized committee.

Response A. The letter to the Clerk of the House from Alberto R. Cardenas, Treasurer of the Special Congressional Election Fund, (SCEF) and the accompanying Statement of Organization (both dated July 13, 1989) are Attachments III, 1 and III, 2, respectively. The SCEF was established to operate as though it were an "authorized committee", in accordance with FEC Advisory Opinion 1977-16.

B. The SCEF filed an amended Statement of Organization dated August 23, 1989, indicating that it was an authorized committee of Ileana Ros-Lehtinen, Republican candidate for Congress from the 18th District of Florida. A copy of this amended Statement of Organization is Attachment III,3.

A copy of a letter from Mr. Alberto R. Cardenas, Treasurer of the Special Congressional Election Fund, to Mr. Todd S. Hageman of the Commission's Reports Analysis Division is Attachment II,4. This letter accompanied the amended Statement of Organization noted as Attachment III,4.

C. Ileana Ros-Lehtinen filed an amended Statement of Candidacy dated August 23, 1989, listing the SCEF as an "Other Authorized Committee". A copy of this amended Statement of Candidacy is Attachment III,5.

D. The Committee filed an amended Statement of Organization dated August 23, 1989, listing the SCEF as an "Affiliated" committee. A copy of this amended Statement of Organization is Attachment III,6.

Question 4. Provide copies of all correspondence received from the January 1990 letters from Richard Preston Tonkinson to the contributors identified in Question 2.

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Mr. Lawrence Noble
Page 5

Response A. A copy of the response received from Frederick W. Guardabassi is Attachment IV,1.

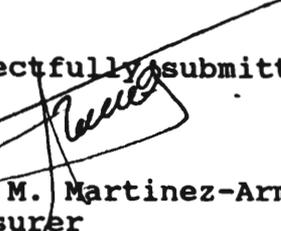
B. A copy of the response received from Alma Morissette is Attachment IV,2.

C. A copy of the response received from the Republican National Committee is Attachment IV,3.

No other responses were received.

Should the Committee locate any additional requested information, we will forward it to the Commission. The above responses are true and accurate to the best of my knowledge and belief.

Respectfully submitted:


Jose M. Martinez-Armesto
Treasurer
Ileana Ros-Lehtinen for Congress

att.

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MAR 27 1990

STATEMENT OF ORGANIZATION

33152

1. NAME OF COMMITTEE OR FUND (Name of name is changing) **Ileana Ros-Lehtinen for Congress** DATE **3/19/90**

(a) Mailing and Street Address (Change of address is changing) **P.O. Box 82-2784**

(b) City, State and ZIP Code **Miami, Florida 33152-2784**

2. FEDERAL IDENTIFICATION NUMBER **000236976/1 JANUARY 29 AM 10:50**

3. IS THIS STATEMENT AN AMENDMENT? YES NO

4. TYPE OF COMMITTEE (Check one)

(a) This committee is a **primary** campaign committee. (Complete the candidate information below.)

(b) This committee is an authorized committee, and is NOT a primary campaign committee. (Complete the candidate information below.)

Name of Candidate Ileana Ros-Lehtinen	Candidate Party Affiliation Republican	Office Sought U.S. House	State/Congress FL-18
---	--	------------------------------------	--------------------------------

(c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee. (Name of candidate)

(d) This committee is a _____ committee of the _____ Party. (National, State or Subordinate) (Democratic, Republican, etc.)

(e) This committee is a separate segregated fund.

(f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
Ileana Ros-Lehtinen for Congress - 1990	9795 South Dixie Highway Miami, Florida 33156	Affiliated

Type of Connected Organization

Corporation Corporation with Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Enrique Ros	8421-B N.W. 56th Street Miami, Florida 33166	Campaign Manager

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Jose M. Martinez-Armesto	5775 Collins Avenue #1206 Miami Beach, FL 33140	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Sun Bank Miami, FL N.A. Account #602001008594	7905 N.W. 58th Street Miami, Florida 33166

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

TYPE OR PRINT NAME OF TREASURER Jose M. Martinez-Armesto	SIGNATURE OF TREASURER <i>[Signature]</i>	DATE 3/19/90
--	--	------------------------

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact
Federal Election Commission
Toll-free 800-424-9530
Local 202-376-3120

FEC FORM 1
(Revised 4/87)

9220493345

800 MAR 30 PM 4:25

RECEIVED
MAY 17 1990

104

FREDERICK WM. GUARDABASSI
SUNRISE PROFESSIONAL BLDG.
818 MIDDLE RIVER DR. - SUITE 210 1022
FORT LAUDERDALE, FL 33304

Aug 24 1987 ~~9-30~~ ~~110~~ 00

PAY TO THE ORDER OF Pos-bentwen for Congress \$ 500 ~~00~~
five hundred and $\frac{00}{100}$ DOLLARS

BANK OF BOSTON
THE FIRST NATIONAL BANK OF BOSTON

FOR Campaign contribution

Frederick W. Guardabassi

92040894936

Affidavit of Debbie Musgrove

Debbie Musgrove, being duly sworn, deposes and says:

1. I am Debbie Musgrove, and I worked in the finance area of the Ileana Ros-Lehtinen for Congress Committee ("the Committee") in the August 1, 1989 and August 29, 1989 special elections. I have knowledge of the facts contained herein and am competent to testify thereto.
2. In that position I was familiar with the Committee's general procedures for receiving, depositing, and entering in the system the contributions received by the Committee.
3. It was the general policy of the Committee to deposit contributions and enter them in the system the same day they were received.
4. I have been informed that this Affidavit will be submitted to the Federal Elections Commission.

Debbie Musgrove
 Debbie Musgrove

Signed and sworn to before me
 this 31st day of May, 1990.

Carole M. Lewis
 Notary Public

My Commission Expires:

NOTARY PUBLIC STATE OF FLORIDA
 MY COMMISSION EXPIRES 4/1993
 BONDED THROUGH CENTRAL INSURANCE

92040894937

ILEANA ROS-LEHTINEN FOR CONGRESS

401 MIRACLE MILE, SUITE 107
CORAL GABLES, FL 33134

1646

63-60-602
880

May 31, 19 90

PAY
TO THE
ORDER OF

Frederick W. Guardabassi

\$ 500.00

five hundred

DOLLARS



SunBank/Miami, N.A.

Palmetto Office
7805 N.W. 56th Street
Miami, FL 33168

Ileana Ros-Lehtinen

FOR

⑈001646⑈ ⑆066000604⑆ 0602001008594⑈

92040894938

May 29, 1990

Mr. and Mrs. William Kaskel
5881 SW 105th Street
Miami, FL 33156

Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Sir/Madam:

This letter will serve to clarify any discrepancy concerning our contributions to the Ileana Ros-Lehtinen for Congress campaign committee in 1989.

Check #146 (copy enclosed) drawn on our joint account and dated August 25, 1989 represents the total of all contributions we made to Rep. Ros-Lehtinen's campaign in 1989. Subsequent to our sending this check, we were requested to designate that this contribution was to be divided equally between the two of us. We again confirm with this letter that an equal allocation to each of us is our intent.

We are now aware that the Federal Election Commission report as filed by the Ros-Lehtinen for Congress committee covering the period of August 10, 1989 through September 18, 1989 indicates that an in-kind donation for food of \$1,000 was received from Mrs. Robin Kaskel. However, there was no in-kind donation of any type or amount made by either of us at any time during the campaign, and we understand that the campaign will be filing an amended report which will accurately reflect that our contributions consisted of this one check for \$2,000 divided equally between us.

We trust that this letter clarifies any uncertainty on the part of the FEC regarding our donations to Rep. Ros-Lehtinen's 1989 campaign committee.

Sincerely:

Mr. William Kaskel

Mrs. Robin Kaskel

92040894939

ALMA E. MORISSETTE
100 CADIMA AVENUE
CORAL GABLES, FL 33134

AUG. 24 1989 4773

PAY TO THE ORDER OF ILEANA ROS-LEHTINEN CAMPAIGN

\$ 1,000.00

One Thousand and no/100 - - - - - DOLLARS

 Southeast Bank, N.A.
CORAL WAY BANKING CENTER
1001 CORAL WAY
MIAMI, FL 33146

MEMO Contribution

Alma E. Morissette

92040894940

ILEANA ROS-LEHTINEN FOR CONGRESS

401 MIRACLE MILE, SUITE 107
CORAL GABLES, FL 33134

1647

63-90-802
880

May 31, 1990

PAY
TO THE
ORDER OF

Alma E. Morissette

\$ 1,000.00

one thousand

DOLLARS



SunBank/Miami, N.A.

Palmetto Office
7905 N.W. 58th Street
Miami, FL 33168

Ileana Ros-Lehtinen

FOR

⑈00 164 7⑈ ⑆066000604⑆ 060 200 1008 594⑈

92040894941

FERNANDO RODRIGUEZ
2690 SW 22ND AVENUE, #407
MIAMI, FL 33135

Aug 23/89 1003

PAY TO THE
ORDER OF

Ilma Ros-Lethina
Three Hundred

Campaign Fund
\$ 300.00

DOLLARS



6390 WEST FLAGLER STREET
MIAMI, FLORIDA 33134

MEMO

Leticia

Fernando Rodriguez

92040894942

ILEANA ROS-LEHTINEN FOR CONGRESS

401 MIRACLE MILE, SUITE 107
CORAL GABLES, FL 33134

1641

63-90-602
660

May 31, 1990

PAY TO THE ORDER OF Fernando Rodriguez

\$ 300.00

three hundred----- DOLLARS



SunBank/Miami, N.A.
Palmato Office
7905 N.W. 58th Street
Miami, FL 33148

602

Ileana Ros-Lehtinen

FOR

⑈001641⑈ ⑆066000604⑆ 0602001008594⑈

92040894943

Van B. Poole
(904) 222-7920

SOUTHEAST BANK OF TALLAHASSEE
101 N. MONROE ST.
TALLAHASSEE, FL 32301

00-1279
001 00279



REPUBLICAN PARTY OF FLORIDA

FEDERAL CAMPAIGN COMMITTEE
P.O. BOX 311
TALLAHASSEE, FLORIDA 32302

DATE 8/7/89

FOUR THOUSAND FIVE HUNDRED AND 00/100

PAY TO THE ORDER OF

ROS LEHTINEN CAMPAIGN
401 MIRACLE MILE
SUITE 107
CORAL GABLES, FL 33134

AMOUNT
\$4,500.00

Walter J. Miller

Barbara S. Morrison

⑈000279⑈ ⑆063662757⑆

248 206055⑈

92040894944

SOUTHEAST BANK OF TALLAHASSEE
101 N. MONROE ST.
TALLAHASSEE, FL 32301

63-1278
631 00288



REPUBLICAN PARTY OF FLORIDA

FEDERAL CAMPAIGN COMMITTEE
P.O. BOX 311
TALLAHASSEE, FLORIDA 32302

DATE 8/9/89

Five thousand and 00/100

AMOUNT

5000 00/100

TO THE
ORDER
OF

Pos - Lehtinen Campaign
401 Miracle Mile Ste 107
Coral Gables, FL 33134

[Signature]
Barbara S. Morrison

⑆000288⑆ ⑆063112757⑆

248 201055⑆

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2138623443



Tag
Lithograph Mount

719 N. Calhoun
P.O. Box 311
Tallahassee, Florida
32302
Bus. (904) 222-7820
Fax. (904) 681-0184

Van B. Poole
Chairman

August 9, 1989

Chester Clem
Vice Chairman

Ida Jackson
Secretary

The Honorable Ileana Ros-Lehtinen
401 Miracle Mile
Suite 107
Coral Gables, FL 33134

D.D. Siggs
Treasurer

Dear Ileana:

Ginny Dinkins
Assistant
Secretary

Enclosed please find a check in the amount of \$5,000, per
your recent request.

John Laurent
Assistant
Treasurer

I would appreciate if you would write a formal request
for this for our files.

Bill Taylor
Special
Ambassador

If there is anything else that we can do for you, please
do not hesitate to contact me.

Maryanne Merse
National
Committeewoman

Sincerely,

Van B. Poole
Chairman

VBP/cfl

enclosure

92040894946

VENDOR NUMBER

01-RD5L001

CHECK NUMBER

44305 0A-044305

00-12450
380

NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE • CONGRESSMAN GUY VANDER JAGT, CHAIRMAN
320 FIRST STREET S.E. *Room 307*
WASHINGTON, D.C. 20003
(202) 478-7040

DATE

08/03/99

CHECK AMOUNT

\$4,500.00

PAY TO THE ORDER OF ILEANA ROS-LENTINEN FOR CONGRESS
TREAS: RICK TOMKINSON
401 MIRACLE MILE, #107
CORAL GABLES, FL 33134

FIRST AMERICAN BANK OF VIRGINIA
MCLEAN, VIRGINIA



⑈00044305⑈ ⑆05600424⑆ ⑆0010050⑆⑈

92040894947



Lee Awater
Republican National Committee

No 017731

610 First Street Southeast, Washington, D.C. 20003

SMITH BANA
2333 JOHNS BLVD.
VIENNA, VA 22180

Pay exactly **5,000** dollars and zero cents

8/3/89 17731

PAY TO
THE
ORDER OF: Ileana Ros-Lehtinen for Congress

Pat Dwyer
10/2/89

\$**5,000.00**

⑈017731⑈ ⑆056004089⑆ 656⑈7307499⑈

92040894949

VENDOR NUMBER		VENDOR NAME		CHECK DATE	CHECK NO.
SPE030		The Special Congressional Election Fund		7/20/89	17683
INVOICE NO.	INVOICE AMOUNT	ADJUSTMENT	NET AMOUNT	EXPLANATION	
SCEF0720	\$5,000.00		\$5,000.00	Contribution	



Republican National Committee .

310 First Street Southeast, Washington, D.C. 20003.

CHECK NO. **017683**

SIGNET BANK
 2000 BOONE BLVD.
 VIRGINIA, VA. 22180

DATE	CHECK NUMBER
7/20/89	17683

Pay exactly ****5,000**** dollars and 00 cents

PAY TO
 THE
 ORDER OF

The Special Congressional Election Fund

AMOUNT
\$5,000.00****

NON-NEGOTIABLE

AUTHORIZED SIGNATURE

100-567680

John Casey
REPUBLICAN PARTY OF DADE COUNTY
FEDERAL ACCOUNT
1340 W 49th St
Hialeah, FL 33012-2946

Maria Alense Martinez
Chairman

1004

8-10 1989 11/101

PAY TO THE ORDER OF ROS. LEHTINEN CAMPAIGN \$5,000.⁰⁰

FIVE THOUSAND ⁰⁰/₁₀₀ DOLLARS

 CAPITAL BANK
Main Office
1221 Brickell Avenue, Miami, FL

Maria Alense Martinez
John Casey

FOR DIRECT CAMPAIGN CONTRIBUTION

⑆001004⑆ ⑆067008464⑆ ⑆010107847⑆⑆

92040894

TYPE OF PICTURE & DESCRIPTION
SEP 21 14 PM 2 54

HAND DELIVERED

REPRESENTATIVE

THE SPECIAL CONGRESSIONAL ELECTION FUND

151966

July 13, 1969

Clerk of the House
U.S. House of Representatives
Office of Records and Registration
1036 Longworth House Office Building
Washington, D.C. 20515

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20004

Re: Statement Of Organization -- The Special
Congressional Election Fund

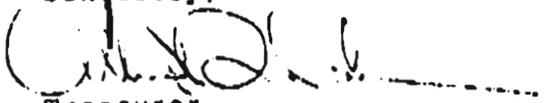
Gentlemen:

The purpose of this letter is to advise you that the enclosed Statement Of Organization for the Election Fund is being filed pursuant to Federal Election Commission Advisory Opinion 1977-16 issued by the Commission on July 29, 1977.

As such, the Congressional Election Fund's Statement Of Organization establishes the Committee as a "political committee" under the Federal Election Campaign Act and will operate as if it is an "authorized committee" pursuant to the above-mentioned FEC Advisory Opinion.

Once the selected candidate retroactively designates the Congressional Election Fund as his principal campaign committee, we will file the required amended Statement Of Organization and Statement Of Candidacy appropriately designating the Committee.

Sincerely,


Treasurer

0 1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22

HAND DELIVERED

RECEIVED
OFFICE OF RECORDS & REGISTRATION

STATEMENT OF ORGANIZATION

JUL 14 PM 2:56

(See reverse side for instructions)

1) NAME OF COMMITTEE (Check if name is changed)
The Special Congressional Election Fund
2) To: (Check if address is changed)
1221 Brickell - 22nd Floor
3) City, State and ZIP Code
Miami, Florida 33131

4) DATE
July 13, 1992
5) FEC IDENTIFICATION NUMBER
To Be Assigned 131400
6) IS THIS STATEMENT AN ASSIGNMENT?
YES NO

7) TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
Name of Candidate _____ Candidate Party Affiliation _____ Where Sought _____ State/District _____
- (c) This committee supports opposes only one candidate _____ and is NOT an authorized committee. Name of Candidate _____
- (d) This committee is a _____ Committee of the _____ Party.
Nature: State or subordinate: _____ (Democrat Republican, etc)
- (e) This committee is a separate segregated fund.
- (f) This committee supports opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

RECEIVED
JUL 14 PM 3:25

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Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization

Corporation Corporation with Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7) Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records

Full Name	Mailing Address	Title or Position
Alberto R. Cardenas	22nd Floor 1221 Brickell Avenue Miami, Florida 33131	Treasurer

8) Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent (e.g. assistant treasurer).

Full Name	Mailing Address	Title or Position
Alberto R. Cardenas	22nd Floor 1221 Brickell Avenue Miami, Florida 33131	Treasurer

9) Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Capital Bank	1221 Brickell Avenue Miami, FL 33131

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

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
Alberto R. Cardenas		7-13-92

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS

For further information contact
Federal Election Commission
Toll-free 800-424-9530
Local 202-376-3120

FEC FORM 1
Revised 4/87

RECEIVED
U.S. HOUSE OF REPRESENTATIVES
1989 AUG 25 PM 3 49

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

1. Name of Committee or Fund
The National Congressional Election Fund
2. Mailing and Street Address
1221 Brickell Avenue - 22nd Floor
3. City, State and ZIP Code
Miami, Florida 33131

4. Is this Statement an Amendment?
NO

5. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee. (name of candidate)
- (d) This committee is a _____ committee of the _____ Party (National, State or subordinate) (Democratic, Republican, etc.)
- (e) This committee is a separate segregated fund.
- (f) A committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Candidate	Candidate Party Affiliation	Office Sought	State/District
Ileena Ros-Jahtinen	Republican	U.S. House	FL-18

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

6. Type of Connected Organization
 Corporation Corporation with Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records

Full Name	Mailing Address	Title or Position
Alberto R. Cardenas	1221 Brickell Avenue-22nd Floor Miami, Florida 33131	Treasurer

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Alberto R. Cardenas	1221 Brickell Avenue-22nd Floor Miami, Florida 33131	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
Capital Bank	1221 Brickell Avenue Miami, Florida 33131

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

TYPE OR PRINT NAME OF TREASURER: **Alberto R. Cardenas**

SIGNATURE OF TREASURER: 

DATE: **8/23/89**

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
Federal Election Commission
Toll-free 800 424 9530
Local 202-376-3170

FEC FORM 1
(revised 4/87)

92040894954
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August 23, 1989

Mr. Todd S. Hageman
Reports Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20004

Dear Mr. Hageman:

This letter and its accompanying documents are submitted in response to your letter concerning the Special Congressional Election Fund's Statement of Organization. As explained in our cover memorandum of July 13, 1989, the Special Congressional Election Fund was organized pursuant to Federal Election Commission Advisory Opinion 1977-16, issued by the Commission on July 29, 1977.

As such, this Committee has been operating as an authorized Committee under the Federal Election Campaign Act pursuant to the above-mentioned Commission Advisory Opinion. Enclosed please find a Statement of Candidacy designating the Special Congressional Election Fund as Ileana Ros-Lehtinen's authorized committee, and an amended Statement of Organization identifying this Committee as an authorized committee of Ileana Ros-Lehtinen.

I trust this satisfies your request.

Sincerely,



AL CARDENAS
Treasurer

92040894955

HAND DELIVERED

STATEMENT OF CANDIDACY

DATE OF BIRTH & BIRTHPLACE
1949 MAR 28 MI 3 48
OFFICE OF THE CLERK
U.S. HOUSE OF REPRESENTATIVES

1. Name of Candidate (in full)
Eleana Ros-Lehtinen

2. Address (number and street)
5772 S.W. 10th Street

3. City, State, and ZIP Code
Miami, Florida 33155

4. Party Affiliation
Republican

5. Office sought
U.S. House of Rep.

6. State & District of Candidate
FL 18

200806936 CAROL 0989

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

6. I hereby designate the following named political committee as my Principal Campaign Committee for the 1999 election(s).
(year of election)

NOTE: This designation should be filed with the appropriate office listed below.

(a) Name of Committee (in full)
Eleana Ros-Lehtinen for Congress

(b) Address (number and street)
401 Miracle Mile - Suite 107

(c) City, State and ZIP Code
Coral Gables, Florida 33134

DESIGNATION OF OTHER AUTHORIZED COMMITTEES

7. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)
The Special Congressional Election Fund

(b) Address (number and street)
1221 Brickell Avenue - 22nd Floor

(c) City, State and ZIP Code
Miami, Florida 33131

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

Signature of Candidate
Eleana Ros-Lehtinen

Date
8/23/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

CANDIDATES FOR THE OFFICE OF:

President mail to:	U.S. Senate mail to:	U.S. House of Representatives mail to:	For further information contact:
Federal Election Commission 999 E Street, N.W. Washington, DC 20463	Secretary of the Senate Office of Public Records 232 Hart Senate Office Bldg. Washington, DC 20510-7116	Clerk of the House of Representatives Office of Records and Registration 1036 Longworth Office Bldg. Washington, DC 20515-6612	Federal Election Commission Toll-free 800/424-9630 Local 202/378-3120

92042512
40894938
93842512

HAND DELIVERED

STATEMENT OF ORGANIZATION

(a) NAME OF COMMITTEE IN FULL
 Kleana Roe-Labrecque for Congress

(b) Mailing and Street Address
 401 Miracle Mile - Suite 107
 Coral Gables, FL 33134

1. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
 - (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | Name of Candidate | Candidate Party Affiliation | Class Sought | State/District |
|----------------------|-----------------------------|--------------|----------------|
| Kleana Roe-Labrecque | Republican | U. S. House | FL-18 |
- (c) This committee supports/opposes only one candidate (Name of Candidate) and is NOT an authorized committee.
 - (d) This committee is a committee of the (National, State or subordinate) (Party) (Democratic, Republican, etc.)
 - (e) This committee is a separate segregated fund.
 - (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship
The Special Congressional Election Fund	1221 Brickell Avenue 22nd Floor Miami, Florida 33131	Affiliated

Type of Connected Organization
 Corporation Corporation with Capital Stock Labor Organization Membership Organization Trade Association Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position of the person in possession of committee books and records.

Full Name	Mailing Address	Title or Position
Richard Preston Tonkinson	9841 S.W. 73 Court, Miami 33156	Treasurer
Maria Victoria Garcia	1811 S.W. 99 Avenue, Miami 33156	Campaign Coordinator

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address	Title or Position
Richard Preston Tonkinson	9841 S.W. 73 Court Miami, Florida 33156	Treasurer

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
SUN BANK - Account # 602001008594 Miami, N.A.	7905 N.W. 58th Street Miami, Florida 33166

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

TYPE OR PRINT NAME OF TREASURER	SIGNATURE OF TREASURER	DATE
RICHARD PRESTON TONKINSON	<i>Richard Preston Tonkinson</i>	8/23/89

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

For further information contact:
 Federal Election Commission
 Toll-free 800-424-9530
 Local 202-576-3120

FEC FORM 1
 (revised 4/87)

92040394957

Frederick W. Guardabassi

Suite 103D Galleria Professional Building
915 Middle River Drive
Fort Lauderdale, Florida 33304

Tel.: (305) 563-6921

February 12, 1990

The Honorable Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

Dear Ileana,

I am in receipt of your treasurer's letter dated January 24th.

Please be assured that my wife has been an admirer of yours for some time, and \$500.00 of the contribution made to your campaign was on her behalf.

Sincerely,



FREDERICK W. GUARDABASSI

FWG/khh

920408894958

January 24, 1990

Alma Morissette
100 Cadina Avenue
Coral Gables, Florida 33134

Dear Alma:

As the Treasurer of the Ileana Ros Lehtinen campaign for 1989, I want to thank you for your generous contributions to her successful campaign.

I have been informed by the Federal Election Commission that you contributed \$2,000 for the general election campaign which is \$1,000 more than is permitted by federal law for an election cycle.

In order to resolve this matter, the Federal Election Commission requires that Congressman Ileana Ros Lehtinen receives written permission by you that states that the \$1,000 can be considered a contribution by your husband or relative that is over 21 years old and that the funds are theirs and not a gift from you.

If this is not possible then your letter should state that the \$1,000 should be used to retire campaign debts or to be used in Ileana's reelection campaign.

Please send the response to:

Congressman Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, Florida 33126

If you have any questions please call Debbie Musgrove at 262-1800.

A quick response will be very appreciated.

Sincerely,

Richard Tonkinson

Richard Tonkinson

2/14/89

Dear Mr. Tonkinson:

Please use the \$1,000 to retire campaign debts -
or use in Ileana's Relection Campaign. As you
prefer.

Alma E. Morissette
Alma E. Morissette

92040894959



**Republican
National
Committee**

Jay C. Banning
Director of Administration
Comptroller

Republican
National
Committee

Jay C. Banning
Director of Administration
Comptroller

February 28, 1990

Mr. Richard Tonkinson
Congressman Ileana Ros Lehtinen
5757 Blue Lagoon Drive
Suite 240
Miami, FL 33126

Dear Mr. Tonkinson:

Thank you for your letter regarding the contributions from the Republican National Committee (RNC) to Ileana Ros Lehtinen for Congress.

Your letter indicates that the RNC made contributions to Ros Lehtinen for Congress in excess of the limits of the Federal Election Campaign Act of 1971, as amended. Your letter further stated that the RNC could designate that the excess contribution be used for campaign debt retirement or reelection. We authorize Ros Lehtinen for Congress the funds to used for debt retirement.

Thank you in advance for your cooperation. Please contact me if you have any questions or comments.

Sincerely,

Jay C. Banning
Assistant Treasurer

92040894960

NOTICE OF ERROR

Earlier today, May 31, 1990, a copy of this report was sent to you by facsimile machine.

Please note that an incorrect version of page four was inadvertently faxed to you (the second paragraph under B was erroneously omitted and copy was spelled wrong).

Mr. Martinez-Armesto's official final draft is enclosed herein.

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OGC 6490



**Republican
National
Committee**

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
Janice P. Lacy
Deputy Chief Counsels

June 8, 1990

Lawrence M. Noble, General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

ATTN: George Rishel

RE: MUR 3054 - Republican
National Committee and
William J. McManus, as
Treasurer

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUN - 8 PM 5:08

Dear Mr. Noble:

We have enclosed documents with our June 8, 1990 submission on the above-captioned matter which are unsigned, due to the absence from the office of certain persons. We intend to submit signed, and notarized, documents as soon as possible.

Thank you for your consideration. If you have any questions, please contact me at 863-8638.

Sincerely,

Janice P. Lacy
Janice P. Lacy

JPL:jd
Enclosures

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**Republican
National
Committee**

Benjamin L. Ginsberg
Chief Counsel

June 8, 1990

Michael A. Hess
Janice P. Lacy
Deputy Chief Counsels

Lawrence M. Noble, General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

ATTN: George Rishel

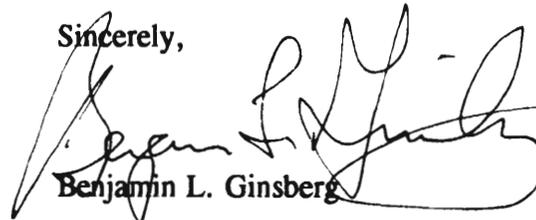
RE: MUR 3054 - Republican National
Committee and William J. McManus,
as Treasurer

Dear Mr. Noble:

Enclosed is a response to the Federal Election Commission's Reason to Believe finding in the above-captioned matter. Also enclosed is a response to the Commission's Interrogatories and Request for Production of Documents submitted on behalf of the Republican National Committee (the "RNC") and William J. McManus, as Treasurer. An amended September 1989 report also is enclosed. For the reasons set forth in the response, the RNC and its Treasurer respectfully move the Commission to take no further action in this matter.

Thank you for your consideration.

Sincerely,



Benjamin L. Ginsberg

BLG:ljd
Enclosures

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BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES

In the Matter of)
REPUBLICAN NATIONAL COMMITTEE) MUR 3054
and William J. McManus,)
as Treasurer)

RESPONSE AND MEMORANDUM IN SUPPORT OF
MOTION TO TAKE NO FURTHER ACTION

On April 19, 1990, the Federal Election Commission ("Commission") found that there is reason to believe the Republican National Committee ("RNC") and its treasurer, William J. McManus, violated 2 U.S.C. §§434 (b) and 441a of the Federal Election Campaign Act ("Act"). This finding is based on an internally-generated complaint brought by the Commission which charges the RNC and its treasurer with exceeding the contribution limitations of the Act as to the Ileana Ros-Lehtinen for Congress Committee ("Committee").

Because the RNC made contributions to the Committee which, in the aggregate, do not violate the Act's contribution limitations, and because the RNC's reports, as amended, conform to the Act and the Commission's regulations for contributions by multicandidate committees, the RNC and its treasurer respectfully move the Commission to take no further action in this matter.

FACTS

This MUR concerns RNC contributions in an August 1989 special election in Florida's 18th congressional district. The RNC made two candidate contributions in that election. The first was a July 20, 1989 undesignated \$5,000 contribution to the Special Congressional Election Fund ("Fund"), a committee without a candidate established pursuant to Advisory Opinion 1977-16. See 1 Fed. Election Camp. Fin.

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Guide [CCH] par. 5258 (July 29, 1977). That contribution was made and received before the August 1 special primary election in which Ileana Ros-Lehtinen was a candidate (see check dated July 20, 1989, and August Report, Schedule B).

After Ileana Ros-Lehtinen won the special primary election, she designated the Fund as an authorized committee, and the Fund transferred its receipts to the Committee. On August 3, after the special primary election and before the August 29 special general election, the RNC contributed \$5,000 to the Committee. The RNC mistakenly designated this contribution for the primary election (see check dated August 3, 1989, and September Report, Schedule B) (Amended Report attached). In sum, the RNC made one undesignated \$5,000 contribution before the primary election to the Fund, and one \$5,000 contribution after the primary election and before the general election, for a total of \$10,000 in contributions to the Ileana Ros-Lehtinen campaign during the 1989 special election cycle.

The Committee mistakenly reported both RNC contributions as made with respect to the general election. After a Commission inquiry, the Committee requested the RNC to redesignate the alleged excess contribution (see Letter from the Committee to the RNC dated January 25, 1989), and the RNC authorized the alleged excess funds to be used for primary election debt retirement (see Letter from RNC to the Committee dated February 28, 1990). In the interim, the Commission questioned the RNC about an excessive contribution to the Committee, specifying the second RNC contribution (see Letter from the Commission to the RNC dated December 20, 1989). In response to this inquiry, the RNC stated that it had made only one \$5,000 contribution on behalf of Ileana Ros-Lehtinen (see Letter from the RNC to the Commission dated December 29, 1989), and after a second inquiry from the Commission dated March 1, 1990, further explained that it had made contributions to both committees, attaching the relevant reports (see Letter from the RNC to the Commission dated March 13, 1990). The RNC did not submit amended reports to the Commission. The Commission then

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generated this matter, claiming that because the Committee has no debts outstanding from the primary election, the second RNC contribution designated for primary election debt retirement should be treated as made with respect to the general election, thereby creating an excessive contribution of \$5,000 to the Committee when added to the RNC's other contribution for the general election.

LAW

The Act permits a multicandidate committee, such as the RNC, to contribute up to \$5,000 per election to a candidate or his authorized political committee. 2 U.S.C. §441a(a)(2). There is no dispute that the RNC contributed an aggregate of \$10,000 for Ileana Ros-Lehtinen, and that \$5,000 was contributed before the primary and \$5,000 between the primary and the special general election. Accordingly, the RNC complied with this statute.

Additionally, Commission regulations encourage, but do not require, multicandidate political committees such as the RNC to designate their contributions in writing for particular elections. 11 C.F.R. §110.2(b)(2)(i). The regulations treat an undesignated contribution as made for "the next election for that Federal office after the contribution is made"; the date a contribution is received is not determinative. *Id.* at §110.2(b)(2)(ii) (emphasis added). Under these rules, the RNC's first contribution -- an undesignated contribution made before the special primary election -- must be treated as made with respect to the primary election, since the RNC made the contribution on July 20, 1989, before the August 1 special primary election.

Moreover, under Advisory Opinion 1977-16, a candidate search committee may receive contributions for a primary election, even if it selects a candidate after that election. The Commission's Factual and Legal Analysis, without citing any authority, is premised on the opposite, stating that all contributions to the Fund should be treated as made with respect to the general election, even though such contributions were

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undesignated and made before the primary election, since the Fund was raising funds for the eventual nominee (Factual and Legal Analysis at 3). Advisory Opinion 1977-16, which provides the rules for such committees, places no such condition on a search committee's operation. Rather, it requires only that "[a]t the time the committee selects a candidate who then authorizes the committee as his or her principal campaign committee, all previous payments received and made are retroactively regarded as contributions accepted and expenditures made by the committee as the principal campaign committee of the selected candidate", and that all excessive contributions resulting from combining the committee's funds with funds received by the candidate before selection by the committee must be refunded. Advisory Opinion 1977-16 at p. 10,205. The Advisory Opinion contains no rule relevant to when a search committee should select a candidate; it does not even indicate the particular timing of the selection of the candidate by the committee which is the subject of the Advisory Opinion. Furthermore, under the rules set forth in the Advisory Opinion, a committee's selection of a candidate and subsequent "transfer" of its funds to that candidate after the primary election would have no effect on the characterization of the funds raised by the committee, because the Advisory Opinion states that "an actual transfer of funds is not anticipated. Rather...the selected candidate will assume constructive control over the funds" (*id.*, at n.1, p. 10,206).

Finally, the Advisory Opinion states that "the [candidate search] committee may operate under the contribution limits applicable to contributions which are made to a principal campaign committee" (*id.* at p. 10,205). As discussed above, principal campaign committees may receive undesignated contributions made prior to a primary election and must deem such contributions as made with respect to the primary election. Given these rules, the Fund may receive contributions for the special primary election, and must consider undesignated contributions made before the primary election, such as the RNC's \$5,000 contribution, as made with respect to the primary

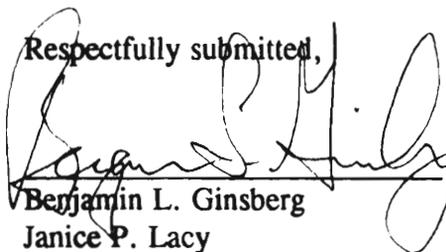
election. Accordingly, the RNC's undesignated contribution to the Fund was made with respect to the primary election.

The RNC's second contribution, made to the Committee, was originally mistakenly designated for the primary election. It is obvious that the code which appears on the check stub and which is used internally to designate contributions on RNC reports to the Commission was not correct, given that the RNC had only a few days previously made an undesignated contribution before the primary election. The RNC has corrected this mistake by amending its September report to show the second contribution as made with respect to the general election (see attached Amended Report).

CONCLUSION

The RNC reports, as amended, correctly characterize the contributions made by the RNC to the Fund and to the Committee consistent with the rules set forth in the Act and the Commission's regulations, and the RNC's aggregate contributions to both committees do not violate the contribution limitations of the Act. Given these considerations, the RNC and its treasurer therefore respectfully move that the Commission take no further action on this matter.

Respectfully submitted,



Benjamin L. Ginsberg

Janice P. Lacy

Counsel for the
Republican National Committee
and William J. McManus,
as Treasurer

Dated: June 8, 1990

92040894968

BEFORE THE FEDERAL ELECTION COMMISSION

OF THE UNITED STATES

In the Matter of)
)
The Republican National Committee) MUR 3054
)
and William J. McManus, as Treasurer)

RESPONSE TO INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

William J. McManus, Treasurer of the Republican National Committee ("RNC"), having been duly sworn, hereby answers the Federal Election Commission's Interrogatories and Request for Production of Documents as follows:

Reports filed with the Federal Election Commission disclose contributions from the Republican National Committee to the Ileana Ros-Lehtinen for Congress Committee of \$5,000 on August 3, 1989, and to the Special Congressional Election Fund of \$5,000 on July 26, 1989.

1. With respect to each of the above contributions, provide copies of the contribution checks and all correspondence to the Ileana Ros-Lehtinen for Congress Committee with respect to these contributions.

RESPONSE: These documents were submitted to the Commission as an attachment to a letter from the RNC to the Commission dated May 24, 1990.

2. With respect to the \$5,000 contribution to the Special Congressional Election Fund, state the date this contribution was delivered to the committee or, if mailed, the date of mailing or postmark. State whether the RNC was aware at the time it made this contribution that the Special Congressional Election Fund was established with the intention of its becoming an authorized committee of Ileana Ros-Lehtinen with respect to the special election on August 29, 1989.

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RESPONSE: The RNC hand-cut the \$5,000 contribution to the Special Congressional Election Fund ("Fund") on July 20, 1989, and delivered the check to the Fund by overnight courier. This check was submitted to the Commission on March 13, 1990.

All relevant RNC documents indicate that the RNC contribution to the Fund was intended to represent a contribution to a committee which had not yet specified a candidate. In its memorandum requesting the contribution, the RNC refers to the Fund only as the "Florida 18 Committee" (Attachment A) and another memorandum refers to it as the "Non-specific committee, Florida 18" (Attachment B). In these memoranda, the RNC neither names nor endorses any specific candidate. Likewise, the Fund's Statement of Organization letter, which was received by the RNC before it made its contribution, states only that "a selected candidate" will retroactively designate the Fund as his principal campaign committee, but also neither names nor endorses any candidate (Attachment B). Thus, the RNC contribution was for whichever candidate won the August 1, 1989 election; the RNC was not aware at the time it made this contribution that the Fund would become an authorized committee of Ileana Ros-Lehtinen with regard to the 1989 special election.

3. State whether the Republican National Committee authorized the NRCC to make §441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of each such authorization.

RESPONSE: The RNC authorized the NRCC to make such expenditures. A copy of the authorization letter is attached (Attachment C).

4. State whether the Republican National Committee authorized the Republican Party of Dade County to make §441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. If so, provide a copy of such authorization.

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REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee
(Summary Page)

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES		2. FEC IDENTIFICATION NUMBER 00003416	
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 310 FIRST STREET SE		3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).	
CITY, STATE and ZIP CODE WASHINGTON DC 20003			

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
 July 15 Quarterly Report
 October 15 Quarterly Report
 January 31 Year End Report
 July 31 Mid Year Report (Non-election Year Only)
 Termination Report

Monthly Report Due On:

- | | | |
|--------------------------------------|--|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20 | <input type="checkbox"/> October 20 |
| <input type="checkbox"/> March 20 | <input type="checkbox"/> July 20 | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20 | <input type="checkbox"/> August 20 | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20 | <input checked="" type="checkbox"/> September 20 | <input type="checkbox"/> January 31 |

- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY		COLUMN A This Period	COLUMN B Calendar Year-to-Date
5.	Covering Period <u>08-01-89</u> through <u>08-31-89</u>		
6.	(a) Cash on Hand January 1, 19 <u>89</u>		\$ 444,462.67
	(b) Cash on Hand at Beginning of Reporting Period	\$ 527,874.65	
	(c) Total Receipts (from Line 18)	\$ 2,602,340.34	\$ 20,494,280.77
	(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 3,130,214.99	\$ 20,938,743.44
7.	Total Disbursements (from Line 28)	\$ 2,572,383.91	\$ 20,380,912.36
8.	Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 557,831.08	\$ 557,831.08
9.	Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 9,989.91	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10.	Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ NONE	

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

Type or Print Name of Treasurer JAY C. BANNING ASSISTANT TREASURER	
Signature of Treasurer _____	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.

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DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full) REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES	Report Covering the Period From: 08-01-89 To: 08-31-89	
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)		
(ii) Unitemized		
(iii) Total of contributions from individuals		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	2,500,000.00	19,806,012.71
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	102,340.34	688,268.06
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	2,602,340.34	20,494,280.77
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	2,224,106.75	19,643,289.84
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	15,000.00	47,459.25
22. INDEPENDENT EXPENDITURES (use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27. OTHER DISBURSEMENTS	333,277.16	690,163.27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2,572,383.91	20,380,912.36
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		
32. TOTAL OPERATING EXPENDITURES (from Line 19)	2,224,106.75	19,643,289.84
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	102,340.34	688,268.06
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	2,121,766.41	18,955,021.78

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11(a)
11(b)
11(c)
11(d)
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23
24
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26(a)
26(b)
26(c)
26(d)
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33
34

PERIOD 08/01/89 TO 08/31/89
RUN DATE 09/07/89

REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES
ITEMIZED DISBURSEMENT
SCHEDULE B LINE 21A

PAGE

1

NAME ADDRESS	PURPOSE OF EXPENDITURE	DATE	AMOUNT
BERRY HILL FOR CONGRESS PO BOX 1506 CERES, CA 95307	CONTRIBUTION CAH0158 CALIFORNIA 15TH DISTRICT SPECIAL	08/23/89	5,000.00
BOB LANIER FOR CONGRESS P.O. BOX 2116 FT. WORTH TX 76113-2116	CONTRIBUTION TXH012R TEXAS 12TH DISTRICT RUN OFF	08/29/89	5,000.00
ILEANA ROG-LEHTINEN / CONGRESS 401 MIRACLE MILE #107 CORAL GABLES FL 33134	CONTRIBUTION FLH018 FLORIDA 18TH DISTRICT GENERAL	08/03/89	5,000.00
	PAGE TOTAL		15,000.00
	GRAND TOTAL		15,000.00

92040394974

OK
NE

MEMORANDUM FOR NORM CUMMINGS

FROM: CHRIS HENICK
DATE: JULY 18, 1989
RE: FL 18 COMMITTEE

I WOULD LIKE TO REQUEST A CHECK FOR \$5,000 TO BE MADE TO THE FLORIDA 18 COMMITTEE. AS DISCUSSED EARLIER, THIS WILL NOT COME OUT OF REGION 3 BUDGET.

THE ADDRESS IS: MR. ALBERTO CARDENAS ,TREASURER
THE SPECIAL CONGRESSIONAL ELECTION FUND
1221 BRICKELL AVENUE
MIAMI, FL 33131

92040894975

TO: Norm Cumming, Pol. Dir., RNC
FROM: Bill Anderson, PAC Dir., NRCC
RE: Non-specific committee, Florida 18

July 17, 1989

ATTACHMENT B

Sam Dawson asked me to forward to you the attached papers which were filed last week creating the non-specific candidate committee for Florida 18.

At the suggestion of our Florida delegation, the committee was named the Special Congressional Election Fund and they are in the process of soliciting contributions from their House colleagues.

If you have any further questions let Sam or me know.

cc Sam Dawson
John Maddox
Deb Amend

92040394976

THE SPECIAL CONGRESSIONAL ELECTION FUND

July 13, 1989

Clerk of the House
U.S. House of Representatives
Office of Records and Registration
1036 Longworth House Office Building
Washington, D.C. 20515

Federal Election Commission
999 E Street, N.W.
Washington, D.C. 20004

Re: Statement Of Organization -- The Special
Congressional Election Fund

Gentlemen:

The purpose of this letter is to advise you that the enclosed Statement Of Organization for the Election Fund is being filed pursuant to Federal Election Commission Advisory Opinion 1977-16 issued by the Commission on July 29, 1977.

As such, the Congressional Election Fund's Statement Of Organization establishes the Committee as a "political committee" under the Federal Election Campaign Act and will operate as if it is an "authorized committee" pursuant to the above-mentioned FEC Advisory Opinion.

Once the selected candidate retroactively designates the Congressional Election Fund as his principal campaign committee, we will file the required amended Statement Of Organization and Statement Of Candidacy appropriately designating the Committee.

Sincerely,



Treasurer

92040894977

STATEMENT OF ORGANIZATION

(See reverse side for instructions)

(a) NAME OF COMMITTEE IN FULL <input type="checkbox"/> (Check if name is changed) The Special Congressional Election Fund	2. DATE July 13, 1989
(b) Mailing and Street Address <input type="checkbox"/> (Check if address is changed) 1221 Brickell- 22nd Floor	3. FEC IDENTIFICATION NUMBER To Be Assigned
(c) City, State and ZIP Code Miami, Florida 33131	4. IS THIS STATEMENT AN AMENDMENT? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO

5. TYPE OF COMMITTEE (Check one)

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
 - (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
- | | | | |
|-------------------|-----------------------------|---------------|----------------|
| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|-------------------|-----------------------------|---------------|----------------|
- (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee.
(name of candidate)
 - (d) This committee is a _____ committee of the _____ Party.
(National, State or subordinate) (Democratic, Republican, etc.)
 - (e) This committee is a separate segregated fund.
 - (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund or a party committee.

Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

Type of Connected Organization

- Corporation
 Corporation w/o Capital Stock
 Labor Organization
 Membership Organization
 Trade Association
 Cooperative

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name Alberto R. Cardenas	Mailing Address 22nd Floor 1221 Brickell Avenue Miami, Florida 33131	Title or Position Treasurer
---	---	---------------------------------------

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name Alberto R. Cardenas	Mailing Address 22nd Floor 1221 Brickell Avenue Miami, Florida 33131	Title or Position Treasurer
---	---	---------------------------------------

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc. Capital Bank	Mailing Address and ZIP Code 1221 Brickell Avenue Miami, FL 33131
---	--

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

TYPE OR PRINT NAME OF TREASURER Alberto R. Cardenas	SIGNATURE OF TREASURER 	DATE 7-13-89
---	----------------------------	------------------------

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g. ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

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For further information contact:
 Federal Election Commission
 Toll-free 800-424-9530
 Local 202-376-3120

FEC FORM 1
(revised 4/87)

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Republican
National
Committee

Lee Atwater
Chairman

August 3, 1989

The Honorable Guy Vander Jagt, Chairman
National Republican Congressional Committee
320 First Street, SE
Washington, D.C. 20003

Dear Guy:

By this letter the Republican National Committee authorizes the National Republican Congressional Committee to serve as the agent of the Republican National Committee for the purpose of making expenditures pursuant to 2 U.S.C. Section 441a(d)(3). Your committee is authorized to make these expenditures on behalf of the Republican National Committee in connection with the special election of Ileana Ros-Lehtinen in District Eighteen in Florida.

Under Section 441a(d)(3) you may spend, on the Republican National Committee's behalf, \$23,990.00 for Ileana Ros-Lehtinen.

Best personal regards.

Very truly yours,

Lee Atwater
Lee Atwater

cc: Norm Cummings
Mary Matalin
Jay Banning
Ben Ginsberg
Ed Rollins
Anne Stanley
Chris Henick
Lauren Zanca

92040894979

ENTER PURCHASES

2- DAILY WORK 1 - ENTER PURCHASES

VENDOR ID REP 220 INVOICE NO. REP 824

INVOICE DATE 8/24/89
(CHECK DATE)

REPUBLICAN PARTY OF DADE
VENDOR NAME

COUNTY INVOICE AMT \$ 7,000.00

BATCH NO. _____

G/L PERIOD 8

ITEM NO (R) (C) _____ TRANSFER OUT

G/L ACCT 01 810 5868 QUANTITY 1 AMOUNT \$ 7,000.00
69

ITEM NO (R) (C) _____

G/L ACCT _____ QUANTITY 1 AMOUNT \$ _____

ITEM NO (R) (C) _____

G/L ACCT _____ QUANTITY 1 AMOUNT \$ _____

ITEM NO (R) (C) _____

G/L ACCT _____ QUANTITY 1 AMOUNT \$ _____

ITEM NO (R) (C) _____

G/L ACCT _____ QUANTITY 1 AMOUNT \$ _____

MANUAL CHECK

AMOUNT PAID \$ 7,000.00 VIA CHECK # 18540

92040894980

REQUEST FOR PURCHASE ORDER



Republican National Committee.
210 First Street Southeast, Washington, D.C. 20003 (202) 693-0200

VENDOR

Dade County Republican Party
 2905 Salzedo
 Coral Gables, FL 33134

DEPT.

Political Outreach

THIS IS A REQUEST- NOT AN APPROVED PURCHASE ORDER.

MARK PACKAGES:

F.O.B.	Routing	Date Required ASAP	Terms	Date Prepared 8-24-89	Quotation Prices
Summary of Quotations Obtained:	Vendors				

Quantity	Description	List Price	Discount%	Net Unit Price	Extended Price
	<input checked="" type="checkbox"/> PARTY BUILDING				7,000 00



Republican National Committee

INFORMATION FOR MONEY WIRE TRANSFER

CAPITAL BANK
 1221 BRICKELL AVENUE
 MIAMI, FL 33131
 305/536-1500

CONTACT: GEROGE FERNANDEZ
 ABA #: 067008414
 REPUBLICAN PARTY OF DADE COUNTY FEDERAL ACCT.
 # 0101078471

AMT: \$ 7,000

Remarks/Spec

Wire money--see attached card

NET TOTAL 7,000 00

Account Number 01-810-5868	Requested By Ivonne Mercado	Approved By <i>[Signature]</i>	Financial Approval <i>[Signature]</i>
-------------------------------	--------------------------------	-----------------------------------	--

ORIGINAL



ADVERTISING CONSULTANTS

August 23, 1989.

Chris

Dade County Republican Party
Coral Gables, Florida

ESTIMATES

Get-out-vote, Vote Republican campaign for
Spanish radio, as follows:

STATION	RATE	THURS.	FRI.	SAT.	SUN.	MON.	TUE	total
WQBA	\$70.	8	8	2	2	10	10	40
WAQI	60.	8	8	2	2	10	10	40
WRHC	40	8	8	2	2	10	10	40

RECAP: WQBA \$ 2,800.
 WAQI 2,400.
 WRHC 1,600.

 \$6,800

~~PLEASE MAKE CHECK PAYABLE TO ADVERTISING CONSULTANTS~~

92040894982

VENDOR NUMBER	VENDOR NAME			CHECK DATE	CHECK NO
REP220	Republican Party of Dade County			8/24/89	18540
INVOICE NO	INVOICE AMOUNT	ADJUSTMENT	NET AMOUNT	EXPLANATION	
REP824	\$7,000.00		\$7,000.00	Transfer out	



Republican National Committee

310 First Street Southeast, Washington, D.C. 20003

SIGNET BANK
 8330 BOONE BLVD.
 VIENNA, VA. 22180

CHECK NO. **018540**
68 40R
500

Handwritten signature: W. J. ...

Pay exactly ****7,000**** dollars and zero cents

PAY TO
 THE
 ORDER OF: **Republican Party of Dade County**

DATE	CHECK NUMBER
8/24/89	18540

AMOUNT
\$7,000.00****

Handwritten signature: W. J. ...

AUTHORIZED SIGNATURE

⑈018540⑈ ⑆056004089⑆ 651⑈7307499⑈

OGC 6574



**Republican
National
Committee**

Benjamin L. Ginsberg
Chief Counsel

Michael A. Hess
Janice P. Lacy
Deputy Chief Counsels

June 12, 1990

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF CENTRAL COUNSEL
90 JUN 12 PM 12:49

Lawrence M. Noble, General Counsel
Federal Election Commission
999 E Street, N.W.
Washington, DC 20463

ATTN: George Rishel

RE: MUR 3054 - Republican National Committee
and William J. McManus, as Treasurer

Dear Mr. Noble:

Enclosed are the signed and notarized documents for our June 8, 1990
submission in the above-captioned matter.

Sincerely,

Janice P. Lacy
Janice P. Lacy

JPL:jd
Enclosures

92040894985

BEFORE THE FEDERAL ELECTION COMMISSION
OF THE UNITED STATES

In the Matter of)
)
The Republican National Committee) MUR 3054
)
and William J. McManus, as Treasurer)

RESPONSE TO INTERROGATORIES
AND REQUEST FOR PRODUCTION OF DOCUMENTS

William J. McManus, Treasurer of the Republican National Committee
("RNC"), having been duly sworn, hereby answers the Federal Election Commission's
Interrogatories and Request for Production of Documents as follows:

Reports filed with the Federal Election Commission disclose contributions from
the Republican National Committee to the Ileana Ros-Lehtinen for Congress Committee
of \$5,000 on August 3, 1989, and to the Special Congressional Election Fund of
\$5,000 on July 26, 1989.

1. With respect to each of the above contributions, provide copies of the
contribution checks and all correspondence to the Ileana Ros-Lehtinen for Congress
Committee with respect to these contributions.

RESPONSE: These documents were submitted to the Commission as an
attachment to a letter from the RNC to the Commission dated May 24, 1990.

2. With respect to the \$5,000 contribution to the Special Congressional
Election Fund, state the date this contribution was delivered to the committee or, if
mailed, the date of mailing or postmark. State whether the RNC was aware at the time
it made this contribution that the Special Congressional Election Fund was established
with the intention of its becoming an authorized committee of Ileana Ros-Lehtinen with
respect to the special election on August 29, 1989.

9
2
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6

RESPONSE: The RNC hand-cut the \$5,000 contribution to the Special Congressional Election Fund ("Fund") on July 20, 1989, and delivered the check to the Fund by overnight courier. This check was submitted to the Commission on March 13, 1990.

All relevant RNC documents indicate that the RNC contribution to the Fund was intended to represent a contribution to a committee which had not yet specified a candidate. In its memorandum requesting the contribution, the RNC refers to the Fund only as the "Florida 18 Committee" (Attachment A) and another memorandum refers to it as the "Non-specific committee, Florida 18" (Attachment B). In these memoranda, the RNC neither names nor endorses any specific candidate. Likewise, the Fund's Statement of Organization letter, which was received by the RNC before it made its contribution, states only that "a selected candidate" will retroactively designate the Fund as his principal campaign committee, but also neither names nor endorses any candidate (Attachment B). Thus, the RNC contribution was for whichever candidate won the August 1, 1989 election; the RNC was not aware at the time it made this contribution that the Fund would become an authorized committee of Ileana Ros-Lehtinen with regard to the 1989 special election.

3. State whether the Republican National Committee authorized the NRCC to make §441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. Provide a copy of each such authorization.

RESPONSE: The RNC authorized the NRCC to make such expenditures. A copy of the authorization letter is attached (Attachment C).

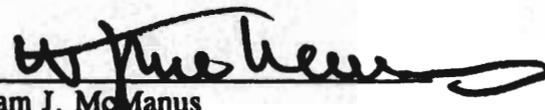
4. State whether the Republican National Committee authorized the Republican Party of Dade County to make §441a(d) expenditures on behalf of Ileana Ros-Lehtinen with respect to the August 29th special election. If so, provide a copy of such authorization.

9 2 0 4 0 8 9 4 9 8 7

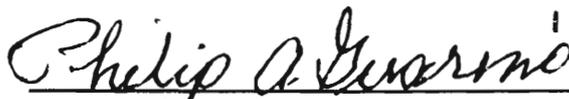
RESPONSE: The RNC has no record of any authorization to the Republican Party of Dade County to make §441a(d) expenditures. It should be noted, however, that this committee could make party building expenditures pursuant to 2 U.S.C. §§431(9)(B)(iv), (viii) and (ix) on behalf of all candidates on the special election ballot, including the Ileana Ros-Lehtinen campaign.

5. State the purpose of the Republican National Committee's transfer of \$7,000 to the Republican Party of Dade County on August 24, 1989, and provide a copy of all correspondence relating to that transfer.

RESPONSE: The purpose of the transfer was the payment of party building expenses relating to a Republican get-out-the-vote radio campaign. The relevant documents to this transfer are attached (Attachment D).


William J. McManus

Subscribed to and sworn before me this 11th day of June, 1990.


Notary Public

My Commission Expires:

My Commission Expires June 14, 1991

92040894938

REPORT OF RECEIPTS AND DISBURSEMENTS

For Other Than An Authorized Committee

(Summary Page)

USE FEC MAILING LABEL OR PRINT TYPE OR PRINT

1. NAME OF COMMITTEE (in full) REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES	2. FEC IDENTIFICATION NUMBER 000003416
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported 310 FIRST STREET SE	3. <input type="checkbox"/> This committee qualified as a multicandidate committee DURING THIS Reporting Period on _____ (date).
CITY, STATE and ZIP CODE WASHINGTON DC 20003	

4. TYPE OF REPORT

- (a) April 15 Quarterly Report
- July 15 Quarterly Report
- October 15 Quarterly Report
- January 31 Year End Report
- July 31 Mid Year Report (Non-election Year Only)
- Termination Report
- Monthly Report Due On:
- | | | |
|--------------------------------------|--|--------------------------------------|
| <input type="checkbox"/> February 20 | <input type="checkbox"/> June 20 | <input type="checkbox"/> October 20 |
| <input type="checkbox"/> March 20 | <input type="checkbox"/> July 20 | <input type="checkbox"/> November 20 |
| <input type="checkbox"/> April 20 | <input type="checkbox"/> August 20 | <input type="checkbox"/> December 20 |
| <input type="checkbox"/> May 20 | <input checked="" type="checkbox"/> September 20 | <input type="checkbox"/> January 31 |
- Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- Thirtieth day report following the General Election on _____ in the State of _____

(b) Is this Report an Amendment? YES NO

SUMMARY	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>08-01-89</u> through <u>08-31-89</u>		
6. (a) Cash on Hand January 1, 19 <u>89</u>		\$ 444,462.67
(b) Cash on Hand at Beginning of Reporting Period	\$ 527,874.65	
(c) Total Receipts (from Line 18)	\$ 2,602,340.34	\$ 20,494,280.77
(d) Subtotal (add Lines 6(b) and 6(c) for Column A and Lines 6(a) and 6(c) for Column B)	\$ 3,130,214.99	\$ 20,938,743.44
7. Total Disbursements (from Line 28)	\$ 2,572,383.91	\$ 20,360,912.36
8. Cash on Hand at Close of Reporting Period (subtract Line 7 from Line 6(d))	\$ 557,831.08	\$ 557,831.08
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	\$ 9,989.91	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	\$ NONE	

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

Type or Print Name of Treasurer
JAY C. BANNING ASSISTANT TREASURER

Signature of Treasurer Date 6/12/90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

92040824989

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

Name of Committee (in full)
REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES

Report Covering the Period
From: **08-01-89** To: **08-31-89**

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)		
(ii) Unitemized		
(iii) Total of contributions from individuals		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTIONS (add 11(a)(iii), (b), and (c))		
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES	2,500,000.00	19,806,012.71
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	102,340.34	688,268.06
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (add 11(d), 12, 13, 14, 15, 16 and 17)	2,602,340.34	20,494,280.77
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	2,224,106.75	19,643,289.84
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES	15,000.00	47,459.25
22. INDEPENDENT EXPENDITURES (use Schedule E)		
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. 441a(d)) (use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees (such as PACs)		
(d) TOTAL CONTRIBUTION REFUNDS (add 26(a), (b), and (c))		
27. OTHER DISBURSEMENTS	333,277.16	690,163.27
28. TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26(d) and 27)	2,572,383.91	20,380,912.36
III. NET CONTRIBUTIONS/OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) (from Line 11(d))		
30. TOTAL CONTRIBUTION REFUNDS (from Line 26(d))		
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from 29)		
32. TOTAL OPERATING EXPENDITURES (from Line 19)	2,224,106.75	19,643,289.84
33. OFFSETS TO OPERATING EXPENDITURES (from Line 15)	102,340.34	688,268.06
34. NET OPERATING EXPENDITURES (subtract Line 33 from 32)	2,121,766.41	18,955,021.78

92040894990

PERIOD 08/01/89 TO 08/31/89
RUN DATE 09/07/89

REPUBLICAN NATIONAL COMMITTEE - EXPENDITURES
ITEMIZED DISBURSEMENT
SCHEDULE B LINE 21A

PAGE

1

NAME ADDRESS	PURPOSE OF EXPENDITURE	DATE	AMOUNT
BERRY HILL FOR CONGRESS PO BOX 1506 CERES, CA 95307	CONTRIBUTION CAH015S CALIFORNIA 15TH DISTRICT SPECIAL	08/23/89	5,000.00
BOB LANIER FOR CONGRESS P.O. BOX 2116 FT. WORTH TX 76113-2116	CONTRIBUTION TXH012R TEXAS 12TH DISTRICT RUN OFF	08/29/89	5,000.00
ILEANA ROS-LEHTINEN / CONGRESS 401 MIRACLE MILE #107 CORAL GABLES FL 33134	CONTRIBUTION FLH018 FLORIDA 18TH DISTRICT GENERAL	08/03/89	5,000.00
		PAGE TOTAL	15,000.00
		GRAND TOTAL	15,000.00

92040394921

STATEMENT OF DESIGNATION OF COUNSEL

MUR 3054

NAME OF COUNSEL: Benjamin L. Ginsberg, Chief Counsel

ADDRESS: Republican National Committee

310 First Street, S.E.

Washington, DC 20003

TELEPHONE: 202/863-8638

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

6/12/90
Date

W. J. McManus
Signature

RESPONDENT'S NAME: Republican National Committee and

ADDRESS: William J. McManus, as Treasurer

310 First Street, S.E.

Washington, DC 20003

HOME PHONE: _____

BUSINESS PHONE: 202/863- 8720

92040894992



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM

TO: LAWRENCE NOBLE
GENERAL COUNSEL

FROM: *MWA* MARJORIE W. EMMONS/DELORES HARRIS *DH*
he SECRETARY OF THE COMMISSION

DATE: JUNE 26, 1990

SUBJECT: MUR 3054 - COMPREHENSIVE INVESTIGATIVE REPORT #1
DATED JUNE 21, 1990

The above-captioned matter was received in the Commission Secretariat at 3:12 p.m. on June 22, 1990 and circulated on a 24-hour no-objection basis at 11:00 a.m. on Monday, June 25, 1990.

There were no objections to the above-captioned matter.

9204089493

90 JUN 22 PM 3:12

BEFORE THE FEDERAL ELECTION COMMISSION

SENSITIVE

In the Matter of)
)
 Ileana Ros-Lehtinen for Congress)
 Committee and Jose J.)
 Martinez-Armesto, as treasurer)
)
 Republican National Committee)
 and William J. McManus, as)
 treasurer)
)
 National Republican Congressional)
 Committee and Jack McDonald, as)
 treasurer)
)
 Republican Party of Florida and)
 Shirlee Bowne, as treasurer)
)
 Republican Party of Dade County)
 and David W. Southwell, as)
 treasurer)

MUR 3054

COMPREHENSIVE INVESTIGATIVE REPORT #1

On April 19, 1990, the Commission made reason to believe findings with respect to the above-named respondents and approved interrogatories and requests for documents to them.

Counsel for the Republican Party of Florida and the National Republican Congressional Committee filed their responses on May 14. The Ileana Ros-Lehtinen for Congress Committee filed its response on June 1. Counsel for the Republican National Committee met with staff of this Office on May 24 and subsequently filed the RNC's response on June 8. The treasurer of the Republican Party of Dade County filed a letter that did not respond to the Commission's questions but stated that all requested information was in the hands of other individuals and is the subject of MUR 3003. None of the respondents have requested preprobable cause conciliation.

92040849494

This Office is currently seeking other means of obtaining the information requested from the treasurer of the Republican Party of Dade County. Furthermore, the treasurer for the Ros-Lehtinen committee has not responded to the question raised in the factual and legal analysis sent to the committee regarding its apparent lack of primary debts. Therefore, this Office will prepare and send a question to the treasurer to clarify this issue, since it is the issue on which the question of the alleged excessive contributions will depend. Once this information is received, this Office will prepare the appropriate report or briefs.

Lawrence M. Noble
General Counsel

6/21/90
Date

BY: 
Lois G. Lerner
Associate General Counsel

Staff assigned: Jeffrey D. Long
George F. Rishel

92040894995



FEDERAL ELECTION COMMISSION

WASHINGTON D.C. 20463

June 27, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2784
Miami, FL 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as treasurer

Dear Mr. Martinez-Armesto:

On April 26, 1990, you were notified that the Federal Election Commission had found reason to believe the Ileana Ros-Lehtinen for Congress ("the Committee") and its treasurer, violated 2 U.S.C. §§ 433(c), 434(a)(6), and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended.

On June 1, 1990, the Commission received your response to the interrogatories and request for documents. The interrogatories and request for documents and your response, however, did not address one critical issue that was raised in the Factual and Legal Analysis sent to you. That issue relates to the primary debt status of the Committee at the time it received the questioned contributions.

Pursuant to its investigation of this matter, the Office of the General Counsel has issued the attached interrogatories and request for documents requesting you to provide the necessary information which will assist the Commission in its consideration of this matter.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to these interrogatories and request for documents. It is requested that you submit all answers to these interrogatories under oath within 15 days of your receipt of this letter.

92040394996

Jose M. Martinez-Armesto
Page 2

If you have any questions, please contact Jeffrey D. Long,
the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Interrogatory and Request for Documents

92040894997

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

)
)
) MUR 3054
)

INTERROGATORIES AND REQUEST
FOR PRODUCTION OF DOCUMENTS

TO: Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2784
Miami, FL 33152-2784

In furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby requests that you submit answers in writing and under oath to the questions set forth below within 15 days of your receipt of this request. In addition, the Commission hereby requests that you produce the documents specified below, in their entirety, for inspection and copying at the Office of the General Counsel, Federal Election Commission, Room 659, 999 E Street, N.W., Washington, D.C. 20463, on or before the same deadline, and continue to produce those documents each day thereafter as may be necessary for counsel for the Commission to complete their examination and reproduction of those documents. Clear and legible copies or duplicates of the documents which, where applicable, show both sides of the documents may be submitted in lieu of the production of the originals.

92040394928

**INTERROGATORIES AND
REQUEST FOR DOCUMENTS**

Commission regulations provide that contributions received after a primary election and designated for the primary election may be accepted only to the extent that the recipient committee has "net debts outstanding" from the primary election at the time of the receipt of such contributions. See 11 C.F.R. § 110.1(b)(3)(i); 11 C.F.R. § 110.2(b)(3)(i). Commission regulations further define "net debts outstanding." See 11 C.F.R. § 110.1(b)(3)(ii) and (iii); 11 C.F.R. § 110.2(b)(3)(ii).

The Committee's reports show contributions received from the Republican Party of Florida dated August 9th for \$5,000, from the National Republican Congressional Committee dated August 3rd for \$4,500, from the Republican National Committee dated August 3rd for \$5,000, and from the Republican Party of Dade County dated August 10th for \$5,000. The Committee's report covering the period from July 15 through July 26, 1989, disclosed ending cash on hand of approximately \$66,112 and outstanding debts of \$20,000. The Committee's report covering the period from July 27 through August 9, 1989, disclosed ending cash on hand of approximately \$54,341 and no outstanding debts. On the basis of these reports, it did not appear that the Committee had net debts outstanding as defined by Commission regulations when it received the above four contributions.

1. As of the August 1, 1989, primary election, identify the total amount of unpaid debts and obligations incurred with respect to the primary election including the estimated cost of raising funds to liquidate those debts. See 11 C.F.R. §§ 110.1(b)(3)(ii) and 110.2(b)(3)(ii). As of the date of the primary, also identify the total cash on hand available to pay those debts and the total amounts owed to the political committee as receivables. See 11 C.F.R. § 110.1(b)(3)(ii)(A) and (B). Provide an itemization of the outstanding debts and cash on hand and receivables and the calculations made in accordance with Commission regulations for your response to Number 1.

2. Identify all adjustments made to the calculation of net debts outstanding in Numbers 1 and 2 to correspond with the dates of the receipt of the four contributions listed above. See 11 C.F.R. § 110.1(b)(3)(iii). Provide an itemization of these adjustments.

3. Provide copies of all documents, including invoices and payment checks, in support of your response to Numbers 1 and 2.

92040894929



RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

06C 6844

90 JUL -3 PM 1:36

HOUSE OF REPRESENTATIVES

ILEANA ROS-LEHTINEN

P.O. Box 52-2784
Miami, FL 33152-2784

June 27, 1990

Mr. Lawrence M. Noble
Office of General Counsel
Federal Election Commission
999 E. Street NW
Washington, DC 20463

Dear Mr. Noble:

Enclosed please find five amended FEC reports for the Ileana Ros-Lehtinen for Congress Committee (F.E.C. ID #C00236976) for the periods listed below:

- 6/6/89 - 7/14/89
- 7/15/89 - 7/26/89
- 7/27/89 - 8/9/89
- 8/10/89 - 9/18/89
- 9/19/89 - 12/31/89

Also, as referenced in the Committee's May 31, 1990 response to MUR 3054, I have enclosed the letter from Mr. and Mrs. William Kaskel, indicating that neither of them made any in-kind contributions to the 1989 Ileana Ros-Lehtinen for Congress Committee.

Respectfully submitted:

J. M. Martinez-Armesto
José M. Martinez-Armesto
Treasurer
Ileana Ros-Lehtinen for Congress Committee

encls.

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 JUL -5 PM 12:36

92040895000

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 JUL -3 PM 1:36

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Ileana Ros-Lehtinen for Congress		2. FEC IDENTIFICATION NUMBER C00236976
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 52-2784		
CITY, STATE and ZIP CODE Miami, FL 33152-2784	STATE/DISTRICT FL-18	3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

4. TYPE OF REPORT

- April 15 Quarterly Report
- Twelfth day report preceding Special Primary
(Type of Election)
election on August 1, 1989 in the State of Florida
- July 15 Quarterly Report
- October 15 Quarterly Report
- Thirtieth day report following the General Election on _____ in the State of _____
- January 31 Year End Report
- July 31 Mid-Year Report (Non-election Year Only)
- Termination Report

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>6/6/89</u> through <u>7/14/89</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	201,813.17	201,813.17
(b) Total Contribution Refunds (from Line 20(d))	-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	201,813.17	201,813.17
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	136,197.47	136,197.47
(b) Total Offsets to Operating Expenditures (from Line 14)	-0-	-0-
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	136,197.47	136,197.47
8. Cash on Hand at Close of Reporting Period (from Line 27)	65,615.70	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	

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

Type or Print Name of Treasurer Jose M. Martinez-Armesto	
Signature of Treasurer 	Date 6/27/90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5437g.

92040895001

DETAILED SUMMARY PAGE

of Receipts and Disbursements
(Page 2, FEC FORM 3)

Name of Committee (in full) Ileana Ros-Lehtinen for Congress	Report Covering the Period: From: 6/6/89	To: 7/14/89
--	--	--------------------

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	169,463.17		11(a)
(ii) Unitemized	-0-		11(a)
(iii) Total of contributions from individuals	169,463.17	169,463.17	11(a)
(b) Political Party Committees	-0-	-0-	11(b)
(c) Other Political Committees (such as PACs)	32,350.00	32,350.00	11(c)
(d) The Candidate	-0-	-0-	11(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	201,813.17	201,813.17	11(e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	-0-	-0-	12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	-0-	-0-	13(a)
(b) All Other Loans	-0-	-0-	13(b)
(c) TOTAL LOANS (add 13(a) and (b))	-0-	-0-	13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	15
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	201,813.17	201,813.17	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	136,197.47	136,197.17	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	-0-	-0-	18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	-0-	-0-	19(a)
(b) Of All Other Loans	-0-	-0-	19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	-0-	-0-	19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	20(a)
(b) Political Party Committees	-0-	-0-	20(b)
(c) Other Political Committees (such as PACs)	-0-	-0-	20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	-0-	-0-	20(d)
21. OTHER DISBURSEMENTS	-0-	-0-	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	136,197.47	136,197.47	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ -0-		23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 201,813.17		24
25. SUBTOTAL (add Line 23 and Line 24)	\$ 201,813.17		25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ 136,197.47		26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ 65,615.70		27

92040895002

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

Page **1** of **16**
FOR THIS NUMBER

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NAME OF COMMITTEE OR FUND

Ileana Ros - Lehtinen For Congress

19 2 0 14 20 8 11 9 1 3 0 3

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
401 Professional Building Sandra J. Rakafsky M.D. 401 Miracle Mile Coral Gables FL 33134	office rent Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-8-89	\$1000.00
B. Full Name, Mailing Address and ZIP Code Board of County Commissioners 111 NW 1 St. #7910 MIAMI, FL 33128	Purpose of Disbursement maps Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-12-89	\$22.26
C. Full Name, Mailing Address and ZIP Code Telesound Systems Corp. 8422 NW 86 Street MIAMI FL 33166	Purpose of Disbursement telephone rental Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-12-89	\$1335.60
D. Full Name, Mailing Address and ZIP Code Sir Speedy 8001 NW 36 Street #103 MIAMI, FL 33166	Purpose of Disbursement printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-12-89	\$164.96
E. Full Name, Mailing Address and ZIP Code Ace Printing 9580 SW 40 Street MIAMI, FL 33165	Purpose of Disbursement printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-13-89	\$384.86
F. Full Name, Mailing Address and ZIP Code OFFICE DEPOT 8601 SW Bird Road MIAMI FL 33165	Purpose of Disbursement office tables + supplies Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-14-89	\$351.47
G. Full Name, Mailing Address and ZIP Code Melloul Travel Consultants 2344 Salzedo Avenue Coral Gables FL 33134	Purpose of Disbursement airfare to Washington D.C. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-14-89	\$228.00
H. Full Name, Mailing Address and ZIP Code Computer + Copy Supplies Corp 98 SE 2 Street MIAMI FL 33131	Purpose of Disbursement Fax Machine Rental Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-14-89	\$91.16
I. Full Name, Mailing Address and ZIP Code BODD Printers Inc. 245 West 75 Place Hialeah, FL 33011	Purpose of Disbursement printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-15-89	2,919.24

SUBTOTAL of Disbursements This Page (optional)

6,497.55

TOTAL This Period (last page this line number 0)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use address computer for each page of the Detailed Summary Page

PAGE 2 OF 16
FORM NO. 1008-10-80

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of obtaining contributions or for commercial purposes, other than using the name and address of any political committee to obtain contributions from such committee

NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen for Congress

19 72 20 14 3 08 30 9 9 0 4

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dial Page Inc. 3638 West Flagler Street MIAMI FL. 33135	beeper Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-15-89	\$73.65
B. Full Name, Mailing Address and ZIP Code 401 Professional Building Sanford J. Rakofsky MD 401 Miracle Mile Coral Gables FL. 33134	parking rental Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-16-89	\$54.00
C. Full Name, Mailing Address and ZIP Code DOB Printers Inc. 245 West 75 Place Hialeah, FL 33014	printing Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-16-89	\$804.92
D. Full Name, Mailing Address and ZIP Code Florida Department of State Division of Elections Room 1801 The Capitol Tallahassee FL. 32399	filing fee Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-19-89	\$4475.00
E. Full Name, Mailing Address and ZIP Code Piedmont Airlines PIEDMONT AIRLINES	airfare Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-19-89	\$272.00
F. Full Name, Mailing Address and ZIP Code City of Coral Gables 365 Aragon Avenue Coral Gables FL. 33134	parking permits Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-19-89	\$ 79.50
G. Full Name, Mailing Address and ZIP Code Petty Cash	petty cash Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-19-89	\$100.00
H. Full Name, Mailing Address and ZIP Code Mardel Photo Supply 2603 Ponce de Leon Blvd. Coral Gables FL 33134	camera Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-19-89	\$262.67
I. Full Name, Mailing Address and ZIP Code Maria Garcia 1811 SW 99 Avenue MIAMI, FL. 33156	consulting service Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-19-89	\$108.00

SUBTOTAL of Disbursements This Page (optional)

> \$6,230.74

TOTAL This Period (all page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use amounts calculated for each category of the Detailed Summary Page

PAGE **5** OF **116**
FOR LINE NUMBER

Any information copied from each Receipt and Statement may not be used or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE OR FULL

Ileana Ros-Lehtinen For Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mauricio Tamargo 9330 SW 43 Street MIAMI FL. 33165	misc. expenses. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-21-89	\$13.68
Prensa Grafica 2025 SW 1 Street MIAMI FL 33135	advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-23-89	\$2000.00
Metro Dade County Store 8588 NW 24 Terrace MIAMI FL 33012	desks Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-26-89	\$31.80
Impressions of Miami Inc 7274 SW 48 Street MIAMI FL 33155	printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-26-89	\$800.00
US Postmaster 2200 NW 72 Avenue MIAMI, FL 33152-9998	postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-26-89	\$120.00
Travel Desot 11850 Bird Road MIAMI, FL. 33175	Airfare to Israel Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-27-89	\$2133.00
Bus Bench Co 475 E. Okee chobee Road Lialesh, FL. 33010	bus benches Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-27-89	\$5080.80
Sobak Computer Services 4342 Sea grape Drive Lauderdale by the Sea, FL 33308	telephone lists Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-27-89	\$1427.00
US Postmaster 2200 NW 72 Avenue MIAMI FL 33152	postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6-27-89	\$2500.00

SUBTOTAL of Disbursements This Page (optional)

14,106.28

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen For Congress

07025080402019

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Southern Bell P.O. Box 02-4000 MIAMI, FL 33102	deposit for telephones Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-12-89	\$ 2200.00
Southern Bell P.O. Box 02-4000 MIAMI FL 33102	telephone bill Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-12-89	\$ 445.00
Joffe's 1140 SW 67 Ave. MIAMI FL 33144	office supplies Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-12-89	\$ 13.23
Ileana Ros-Lehtinen 401 Miracle Mile Coral Gables, FL 33134	reimb. for equipment purchase Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	6/21/89	\$ 1,200.00
Puebla Women's Club 13751 SW 84 Street MIAMI, FL 33183	refund Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-12-89	\$ 1.00
Biscayne Bay Marriott Hotel and Marina 1633 North Bayshore Drive MIAMI, FL 33132	deposit for salon Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-12-89	\$ 500.00
G. Full Name, Mailing Address and ZIP Code			
H. Full Name, Mailing Address and ZIP Code			
I. Full Name, Mailing Address and ZIP Code			

SUBTOTAL of Disbursements This Page (optional)

4,359.23

TOTAL This Period (last page the line number only)

MODULE B

ITEMIZED DISBURSEMENTS

Use address calculated for each category of the Detailed Summary Page

Date of 16 of 16 FOR LINE NUMBER

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (to Full)
 > **Ileana Ros - Lehtinen for Congress**

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Federal Express 150 Alhambra Circle CORAL GABLES, FL. 33134	Express mail Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-14-89	\$51.25
The Computer + Copy Supplies Shop 93 SE 2 Street MIAMI FL 33131	Fax rental Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-14-89	\$94.80
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional): **\$ 136.05**

TOTAL This Period (last page the line number only): **#/136 19747**

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

90 JUL -3 PH 1:36

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Ileana Ros-Lehtinen for Congress		2. FEC IDENTIFICATION NUMBER C00236976
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 52-2784		
CITY, STATE and ZIP CODE Miami, FL 33152-2784	STATE/DISTRICT FL-18	3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

4. TYPE OF REPORT

<input type="checkbox"/> April 15 Quarterly Report	<input checked="" type="checkbox"/> Twelfth day report preceding <u>Special Primary</u> <u>Fifth</u> (Type of Election)
<input type="checkbox"/> July 15 Quarterly Report	election on <u>8/1/89</u> in the State of <u>Florida</u>
<input type="checkbox"/> October 15 Quarterly Report	<input type="checkbox"/> Thirtieth day report following the General Election on _____
<input type="checkbox"/> January 31 Year End Report	_____ in the State of _____
<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only)	<input type="checkbox"/> Termination Report

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>7/15/89</u> through <u>7/26/89</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	170,846.95	372,660.12
(b) Total Contribution Refunds (from Line 20(d))	-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	170,846.95	372,660.12
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	170,824.34	307,021.81
(b) Total Offsets to Operating Expenditures (from Line 14)	-0-	-0-
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	170,824.34	307,021.81
8. Cash on Hand at Close of Reporting Period (from Line 27)	65,638.31	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	20,000.00	

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

Type or Print Name of Treasurer Jose M. Martinez-Armesto	Date 6/27/90
Signature of Treasurer 	

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

92040895009

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full) Ileana Ros-Lehtinen for Congress	Report Covering the Period: From: 7/15/89 To: 7/26/89
--	--

I. RECEIPTS

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	140,646.95		11(a)
(ii) Unitemized	-0-		11(b)
(iii) Total of contributions from individuals	140,646.95	310,110.12	11(c)
(b) Political Party Committees	-0-	-0-	11(d)
(c) Other Political Committees (such as PACs)	30,200.00	62,550.00	11(e)
(d) The Candidate	-0-	-0-	
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	170,846.95	372,660.12	

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	-0-	-0-	12
---	-----	-----	----

13. LOANS:			
(a) Made or Guaranteed by the Candidate	-0-	-0-	13(a)
(b) All Other Loans	-0-	-0-	13(b)
(c) TOTAL LOANS (add 13(a) and (b))	-0-	-0-	13(c)

14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	14
--	-----	-----	----

15. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	15
--	-----	-----	----

16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	170,846.95	372,660.12	16
--	------------	------------	----

II. DISBURSEMENTS

17. OPERATING EXPENDITURES	170,824.34	307,021.81	17
----------------------------	------------	------------	----

18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	-0-	-0-	18
---	-----	-----	----

19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	-0-	-0-	19(a)
(b) Of All Other Loans	-0-	-0-	19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	-0-	-0-	19(c)

20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	20(a)
(b) Political Party Committees	-0-	-0-	20(b)
(c) Other Political Committees (such as PACs)	-0-	-0-	20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	-0-	-0-	20(d)

21. OTHER DISBURSEMENTS	-0-	-0-	21
-------------------------	-----	-----	----

22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	170,824.34	307,021.81	22
---	------------	------------	----

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	65,615.70	23
---	----	-----------	----

24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$	170,846.95	24
---	----	------------	----

25. SUBTOTAL (add Line 23 and Line 24)	\$	236,462.65	25
--	----	------------	----

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$	170,824.34	26
--	----	------------	----

27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$	65,638.31	27
--	----	-----------	----

92040895010

SCHEDULE A

ITEMIZED RECEIPTS
IN KIND CONTRIBUTIONS

Use separate schedules for each category of the Detailed Summary Page

PAGE 77 OF 77
FOR LINE NUMBER 11A:

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NAME OF COMMITTEE (in Full)
Ileana Ros Lehtinen for Congress C00236976

92040895011
03013931450

A. Full Name, Mailing Address and ZIP Code <i>Helen Crittenden 1023 Pinar Drive Orlando FL 32825</i>	Name of Employer	Date (month, day, year) <i>7-23-89</i>	Amount of Each Receipt this Period <i>\$326.50</i> <i>in kind; Beverage/ Flowers</i>
	Occupation <i>house wife</i>	Aggregate Year-to-Date <i>0</i>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

B. Full Name, Mailing Address and ZIP Code <i>Julia Oliva 928 SW 10 Street MIAMI FL 33130</i>	Name of Employer <i>Green Sun Printing Corp</i>	Date (month, day, year) <i>7-25-89</i>	Amount of Each Receipt this Period <i>\$86.00</i> <i>in kind; printing</i>
	Occupation <i>President</i>	Aggregate Year-to-Date <i>0</i>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

C. Full Name, Mailing Address and ZIP Code <i>BONGY GARCIA 1811 SW 93RD AVE. MIAMI, FL 33145</i>	Name of Employer	Date (month, day, year) <i>7/15/89</i>	Amount of Each Receipt this Period <i>\$199.62</i> <i>sale in-kind</i>
	Occupation	Aggregate Year-to-Date <i>199.62</i>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

D. Full Name, Mailing Address and ZIP Code <i>Patricia Barton 605 Palm Circle East Naples, FL 33940</i>	Name of Employer	Date (month, day, year) <i>7/15/89</i>	Amount of Each Receipt this Period <i>\$66.59</i> <i>postage/paper in-kind</i>
	Occupation	Aggregate Year-to-Date <i>66.59</i>	
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	Aggregate Year-to-Date	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	Aggregate Year-to-Date	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
	Occupation	Aggregate Year-to-Date	
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):			

SUBTOTAL of Receipts This Page (optional) *1,451.71*
TOTAL This Page (Use only for line number only) *16,676.95*

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use spaces allocated for each category of the Detailed Summary Page

PAGE **2** OF **13**
FOR LINE NUMBER **17**

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NAME OF COMMITTEE (in Full)

Ileana Ros - Lehtinen for Congress C00236976

92040895012
03713934455

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Jaffe's 1190 SW 67 Avenue MIAMI, FL 33144</i>	<i>office supplies</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-17-89</i>	<i>\$ 71.34</i>
<i>U.S. Postmaster 251 Valencia Avenue MIAMI FL. 33128</i>	<i>postage</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-17-89</i>	<i>\$175.00</i>
<i>Radio Shack Allapattah Shopping Center 20161 South Federal Highway MIAMI, FL. 33189</i>	<i>computer supplies</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-17-89</i>	<i>\$142.99</i>
<i>Federal Express 150 Alhambra Circle CORAL GABLES, FL. 33134</i>	<i>express mail</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-18-89</i>	<i>\$60.00</i>
<i>U.S. Postmaster 2200 NW 72 Avenue MIAMI FL. 33152</i>	<i>postage</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-19-89</i>	<i>\$4000.00</i>
<i>Advertising Consultants 3605 SW 113 PLACE MIAMI, FLORIDA 33165</i>	<i>tv and radio Advertising</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-20-89</i>	<i>\$70,000.00</i>
<i>Petty Cash</i>	<i>petty cash</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-20-89</i>	<i>\$100.00</i>
<i>Dodd Printing 245 WEST 75 PLACE Hialeah, FL. 33014</i>	<i>printing</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-20-89</i>	<i>\$4022.70</i>
<i>Postal World Services 275 W 75 PLACE Hialeah, FL. 33014</i>	<i>labels.</i> Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-20-89</i>	<i>\$ 890.33</i>

SUBTOTAL of Disbursements This Page (optional) *\$79,462.36*

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 6 OF 13
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress C00236976

92040895013
C
383445

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MIAMI Beach Chamber of Commerce 1920 Meridian Avenue MIAMI Beach, FL. 33139	lunch expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-24-89	\$24.00
Federal Express 150 Alhambra Circle Coral Gables, FL 33134	express mail Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-24-89	\$15.00
Board of County Commissioners 111 NW 1 Street #1910 MIAMI, FL. 33128	lists Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-24-89	\$22.50
Southern Bell P.O. Box 02-4000 MIAMI FL. 33102	telephone Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-24-89	\$800.00
Southern Bell P.O. Box 02-4000 MIAMI FL 33102	telephone Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-24-89	\$500.00
Bill Hebrock and Associates 253 East Virginia Street Tallahassee, FL. 32301	consulting expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-24-89	\$10,777.79
Louis Zayas 435 Summit Avenue Englewood Cliffs, N.J. 07632	gasoline expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-24-89	\$35.60
Board of County Commissioners 111 NW 1 Street #1910 MIAMI, FL. 33128	lists Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-25-89	\$22.00
Petty Cash	petty cash Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-25-89	\$100.00

SUBTOTAL of Disbursements This Page (optional) \$12,296.89

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 9 OF 13
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen for Congress C00236976

92040895014
09013874433

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Advertising Consultants 3605 SW 113 PLACE MIAMI, FLORIDA 33165	advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$7979.00
B. Full Name, Mailing Address and ZIP Code Dodd Printing 245 West 75 PLACE Hialeah, FL. 33014	printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$5710.03
C. Full Name, Mailing Address and ZIP Code Postal World Services 275 West 75 PLACE Hialeah, FL. 33014	printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$721.47
D. Full Name, Mailing Address and ZIP Code U.S. Postmaster 2200 NW 72 AVENUE MIAMI, FL 33152	postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$1515.00
E. Full Name, Mailing Address and ZIP Code EL SOCIAL SECURITY NEWS 4 MEDICARE NEWS P.O. Box 45-3324 MIAMI, FL. 33245-3324	advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$800.00
F. Full Name, Mailing Address and ZIP Code MIAMI AIRPORT HILTON 5101 Blue Lagoon Drive MIAMI, FL. 33126	hotel reception Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$3810.30
G. Full Name, Mailing Address and ZIP Code Busy Bee Printing Center 393 Argon Avenue Coral Gables, FL	printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$292.78
H. Full Name, Mailing Address and ZIP Code US Postmaster 2200 NW 72 Avenue MIAMI, FL. 33152	postage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$1002.65
I. Full Name, Mailing Address and ZIP Code Dwetta Hunter 178 NW 54 Street MIAMI FL.	office expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$1000.00

SUBTOTAL of Disbursements This Page (optional) \$2303.23

TOTAL This Period (last page this line number only)

SCHEDULE B ITEMIZED DISBURSEMENTS
IN KIND EXPENDITURES

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NAME OF COMMITTEE (in Full)
Ileana Ros - Lehtinen for Congress CA236976

92040895016
09013834467

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Mr. Anthony Farah 1001 So. Bayshore Drive Suite 2304 MIAMI, FL. 33131	Food/Beverage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$840.99 in kind received
Mr. Jorge Mas Canosa 7300 NW 35 Terrace Suite 105 MIAMI, FL. 33122	Food/Beverage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-18-89	\$250.00 in kind received
Patricia Wilson Wheeler 810 S. Cincinnati Suite 200 Tulsa, OKLAHOMA 74119	Food Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$125.00 in kind received
Mr. Raul Mas 7495 SW 81 Avenue MIAMI, FL 33143	Food/Beverage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$652.95 in kind received
Mr. Ed Lasher 7220 NW 36 Street Suite 530 MIAMI, FL 33166	Food/Beverage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-26-89	\$500.00 in kind received
GAIL Handy 2565 Forrest Road Winter Park, FL. 32789	Food/Beverage Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-23-89	\$1000.00 in kind received
Helen Crittenden 1023 Pinar Drive Orlando, FL 32825	Beverage/Flowers Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-23-89	\$326.50 in kind received
K. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional) \$3695.44

TOTAL This Period (last page this line number only) \$170,824.34

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee (Summary Page) RECEIVED
FEDERAL ELECTION COMMISSION

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Ileana Ros-Lehtinen for Congress		90 JUL -3 PM 1:36
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 52-2784		2. FEC IDENTIFICATION NUMBER C00236976
CITY, STATE and ZIP CODE Miami, FL 33152-2784	STATE/DISTRICT FL-18	3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

4. TYPE OF REPORT

- April 15 Quarterly Report
- Twelfth day report preceding Special General
(Type of Election)
- July 15 Quarterly Report
- Thirtieth day report following the General Election on _____
- October 15 Quarterly Report
- election on 8/29/89 in the State of Florida
- January 31 Year End Report
- Termination Report
- July 31 Mid-Year Report (Non-election Year Only)
- _____ in the State of _____

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY

	COLUMN A This Period	COLUMN B Calendar Year-to-Date
5. Covering Period <u>7/27/89</u> through <u>8/9/89</u>		
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	109,971.15	482,631.27
(b) Total Contribution Refunds (from Line 20(d))	-0-	-0-
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	109,971.15	482,631.27
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	197,366.67	504,388.48
(b) Total Offsets to Operating Expenditures (from Line 14)	-0-	-0-
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	197,366.67	504,388.48
8. Cash on Hand at Close of Reporting Period (from Line 27)	(2,757.21)	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)		For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	22,919.40	

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

Type or Print Name of Treasurer Jose M. Martinez-Armesto	
Signature of Treasurer 	Date 6/27/90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

92040895017

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full) Ileana Ros. Lehtinen for Congress	Report Covering the Period: From: 7/27/89 To: 8/9/89
---	---

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	71,271.15		11(a)
(ii) Unitemized	-0-		11(a)
(iii) Total of contributions from individuals	71,271.15	381,381.27	11(a)
(b) Political Party Committees	14,000.00	14,000.00	11(b)
(c) Other Political Committees (such as PACs)	24,700.00	87,250.00	11(c)
(d) The Candidate	-0-	-0-	11(d)
(e) TOTAL CONTRIBUTIONS (other than loans)(add 11(a)(iii), (b), (c) and (d))	109,971.15	482,631.27	11(e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	19,000.00	19,000.00	12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	-0-	-0-	13(a)
(b) All Other Loans	-0-	-0-	13(b)
(c) TOTAL LOANS (add 13(a) and (b))	-0-	-0-	13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	15
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	128,971.15	501,631.27	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	197,366.67	504,388.48	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	-0-	-0-	18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	-0-	-0-	19(a)
(b) Of All Other Loans	-0-	-0-	19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	-0-	-0-	19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	-0-	-0-	20(a)
(b) Political Party Committees	-0-	-0-	20(b)
(c) Other Political Committees (such as PACs)	-0-	-0-	20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	-0-	-0-	20(d)
21. OTHER DISBURSEMENTS	-0-	-0-	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	197,366.67	504,388.48	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$ 65,638.31	23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$ 128,971.15	24
25. SUBTOTAL (add Line 23 and Line 24)	\$ 194,609.46	25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$ 197,366.67	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$ (2,757.21)	27

92040895018

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 10 of 10 for
LINE NUMBER 10
(Use separate schedule
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
Ileana Ros Lehtinen for Congress C 00236976				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor Hebrock and Associates Inc. 253 East Virginia Street Tallahassee, Florida 32301	\$20,000	5,673.37	20,000.00	5,673.37
Nature of Debt (Purpose): Fundraising / consulting				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor Florida Lumber 2431 NW 20th St. MIAMI, FL 33142	\$ -0-	1,504.70	-0-	1,504.70
Nature of Debt (Purpose): CAMPAIGN SIGNS				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor Coalitions, Inc. 505 2nd St. NE Washington, DC 20002	\$ -0-	904.13	-0-	904.13
Nature of Debt (Purpose): TRAVEL and OFFICE EXPENSES				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor Advertising Consultants 3605 SW 113th PLACE MIAMI, FL 33165	\$ -0-	14,837.20	-0-	14,837.20
Nature of Debt (Purpose): MEDIA PRODUCTION EXPENSE				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				22,919.40
2) TOTAL This Period (last page this line only)				22,919.40
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				-0-
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				22,919.40

92040895019

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use columns separately for each category of the Detailed Summary Page
 PAGE 08
 1 1 16
 FOR LINE NUMBER

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NAME OF COMMITTEE OR POL:

Ileana Ros - Lehtinen for Congress

0202089250308

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Dodd Printers Inc. 245 West 75 PLACE MIAMI, FL 33014</i>	<i>printing</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-27-89</i>	<i>\$232.88</i> X
<i>EL Nuevo Herald 1 Herald PLAZA MIAMI FL. 33132</i>	<i>advertising</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-27-89</i>	<i>\$2243.70</i> X
<i>The Miami Herald 1 Herald PLAZA MIAMI, FL. 33132</i>	<i>advertising</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-27-89</i>	<i>\$1038.57</i> X
<i>U.S. Postmaster 251 Valencia Avenue Coral Gables, FL 33128</i>	<i>postage</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-27-89</i>	<i>\$950.34</i> X
<i>Busy Bee Printing Center 593 Aragon Avenue Coral Gables FL. 33134</i>	<i>printing</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-27-89</i>	<i>\$33.92</i> X
<i>Ileana Ros - Lehtinen 401 Miracle Mile Coral Gables, FL</i>	<i>expenses</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-27-89</i>	<i>\$57.68</i> X
<i>Augustin Biacco P.O. Box 521208 MIAMI FL. 33152-1208</i>	<i>photographs</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-27-89</i>	<i>\$140.00</i> X
<i>M. Full Name, Mailing Address and ZIP Code</i>	<i>Purpose of Disbursement</i>	<i>Date (month, day, year)</i>	<i>Amount of Each Disbursement This Period</i>
	Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
<i>Maurice Filizandes 5351 NW 7 St # 211 MIAMI FL. 33126</i>	<i>consulting service</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>7-27-89</i>	<i>\$209.00</i> X

TOTAL of Disbursements This Reporting Period *4,898.09*

TOTAL This Period for all reporting periods

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use spaces provided for each category of the Detailed Summary Page
 PAGE 2 OF 16
 FOR LINE NUMBER

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NAME OF COMMITTEE (In Full)

Ileana Ros- Lehtinen for Congress

92040895021
 017713841261

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Kir Tisdale 181 Stamford Circle West Palm Beach FL 33414	expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$150.00 X
Louis Zayas 485 Summit Avenue Englewood Cliffs N.J. 07632	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$150.00 X
Tara Tamaro 9330 SW 43 Street MIAMI FL. 33165	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$375.00 X
Mauricio Tamargo 9330 SW 43 Street MIAMI FL 33165	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$750.00 X
Maria Garcia 1211 SW 99 Avenue MIAMI, FL. 33165	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$750.00 Y
Eell South Mobility P.O. Box 105623 Atlanta, GA 30348-5623	telephone expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$238.55 X
Dial Page Inc. 363E West Flag Street MIAMI FL. 33135-1074	keeper rental Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$73.63 X
Southern Bell P.O. Box 02-4000 MIAMI FL. 33102	telephone expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-25-89 8-3-89	\$2279.61 X 670.00
Richard Tomkinson 9841 SW 73 Court MIAMI, FL. 33156	expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-25-89	\$163.27 X

SUBTOTAL of Disbursement This Page (options)

\$5,600.06

TOTAL This Period (list each of the numbers only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate sheets for each category of the Detailed Summary Page

PAGE 4 OF 16
FORM LINE NUMBER

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

92040895022
R7713841263

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Gables Advertising Concepts 165 Aragon Avenue Coral Gables, FL 33134-5470	small fans Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$150.00 X
Southern Bell P.O. Box 02-4000 MIAMI, FL 33102	telephone expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$480.00 X
Southern Bell P.O. Box 02-4000 MIAMI, FL 33102	telephone expense Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$615.00 X
Petty Cash	petty cash Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$100.00 X
Petty Cash	petty cash Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$100.00 X
Petty Cash	petty cash Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-28-89	\$100.00 X
U.S. Postmaster Coral Gables, FL 33134	postage Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7/28/89	1,750.00
SARAK Computer Services 4342 Seabreeze Drive Lauderdale-by-the-Sea, FL 33308	labels Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-29-89	\$155.00 X
Petty Cash	petty cash Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-29-89	\$100.00 X

SUBTOTAL of Disbursements This Page (attach)

2,550.00

TOTAL This Period (list page and line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

Page 6 of 16
FOR LINE NUMBER

Any information coming from such Records and Statements may not be used or used by any person for the purpose of collecting contributions or for campaign purposes, other than using the name and address of any political committee to collect contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros - Lehtinen for Congress

0912701408082560523

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Petty Cash</i>	<i>payment of Poll Workers</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-1-89</i>	<i>\$2000.00</i> X
<i>Horizonte de America 8369 NW 36 STREET MIAMI, FL 33136</i>	<i>advertising.</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-1-89</i>	<i>\$150.00</i> X
<i>Federal Express 150 Alhambra Circle Coral Gables, FL 33134</i>	<i>express mail</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-1-89</i>	<i>\$15.00</i> X
<i>Stewart Bloom Assoc. Inc. 18715 SW 84 Avenue MIAMI, FL 33157</i>	<i>Telephone conference service</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-1-89</i>	<i>\$125.00</i> X
<i>H. Brock and Associates Inc. 253 East Virginia Street Tallahassee, FL 32301</i>	<i>consu Hing service</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-4-89</i> <i>8-9-89</i>	<i>\$10,000.00</i> X <i>\$10,000.00</i>
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (include all lines) *\$22,290.00*

TOTAL This Period (include all lines) *\$22,290.00*

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 7 OF 16 FOR LINE NUMBER

Any information obtained from such Records and Statements may not be sold or used by any person for the purpose of raising contributions or for commercial purposes, other than using the name and address of any political committee to obtain contributions from such committee.

NAME OF COMMITTEE On Ballot

Ileana Ros - Lehtinen For Congress

09294889250624

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Southern Bell P.O. Box 02-4000 MIAMI, FL 33102	telephone expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-2-89	\$ 400.00 X
Southern Bell P.O. Box 02-4000 MIAMI, FL 33102	telephone expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-2-89	\$ 160.00 X
Bus Bench Company 475 E. Okeechobee Road Aialeah, FL 33010	bus bench Ads Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-2-89	\$ 9,545.00 X
Gables Advertising Concepts 165 Aragon Avenue Coral Gables, FL 33134-5476	advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-2-89	\$ 114.72 X
Gables Advertising Concepts 165 Aragon Avenue Coral Gables, FL 33134-5476	advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-2-89	\$ 125.00 X
Jaffe's 1140 SW 67 Avenue MIAMI, FL 33144	office supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-2-89	\$ 82.52 X
Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-3-89	\$ 203.00 X
Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-3-89	\$ 385.00 X
Southern Bell P.O. Box 02-4000 MIAMI, FL 33102	telephone expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-3-89	\$ 2400.00 X

SUBTOTAL of Disbursements This Page (actions)

13,412.62

TOTAL This Period (see page one line number)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (in Full)

Ileana Ros - Lehtinen For Congress

91204308195025

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
GBA County Store 8888 NW 24 Terrace MIAMI FL 33122	desks. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-3-89	\$220.48
City of Coral Gables Parking Department 365 Aragon Avenue Coral Gables FL 33134	parking permits Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-3-89	\$190.80
Louis Zayas 435 Summit Avenue Englewood Cliffs N.J. 07632	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-3-89	\$150.00
Bishop Production Account 2961 SW 87 Avenue Lauder FL 33328	advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$6,000.00
Advertising Consultants 3615 SW 113 PLACE MIAMI FL 33165	TV and radio Advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$53,000.00
Office Depot 8201 SW Eird Road MIAMI FL 33165	office supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$267.12
Roman Photo Color 1563 NW 27 Avenue MIAMI FL 33125	photographic Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$111.00
Kim Tisdale 1519 Stamford Circle West Palm Beach FL 33414	expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$150.00

F. TOTAL of Disbursements This Page (optional) \$60089.40

G. TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use amount calculated for each category of the Detailed Summary Page

PAGE 9 OF 16
FOR LINE NUMBER

Any information copied from such Reports and Statements may not be used or used by any person for the purpose of soliciting contributions or for continuing purposes, other than using the name and address of any political committee to solicit contributions from such committee

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen For Congress

0270499926826

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Maurice Hernandez 5085 NW 7 St. #211 MIAMI, FL 33126	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$200.00 X
Tara Tamargo 9330 SW 43 Street MIAMI, FL 33165	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$325.00 X
Alonso del Portillo 638 Velarde Avenue Coral Gables, FL 33134	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$926.50 X
Wendy Donath 4201 South 31 Street Apt 748 Arlington, Virginia 22206	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$1500.00 X
Tom Tew 701 Euckell Avenue MIAMI, FL 33131-2931	expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$1,710.58 X
Wendy Donath 4201 South 31 Street Apt 748 Arlington, Virginia 22206	hotel expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$313.37 X
Ileana Ros-Lehtinen 41 N.W. 11th Coral Gables, FL 33134	computer expense Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$753.75 X
Peri Carr	party cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$100.00 X
MHT Co 100 S.W. 1st St MIAMI, FL 33131	photo copies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$200.00 X

SUBTOTAL of Disbursements This Period (Include all items) \$5,229.40

TOTAL This Period (Include all items) \$5,229.40

SCHEDULE B

ITEMIZED DISBURSEMENTS

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of obtaining contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ras - Lectures in Congress.

92201308926927

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
MHT Co. of Florida 100 Chapin Plaza 17th Floor MIAMI, FL, 33131	telephone expense Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-4-89	\$250.00 X
Telesound Systems Corp. 8422 NW 56 Street MIAMI FL. 33166	telephone equipment Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$2390.30 X
Dr. Thomas Ferguson 5925 NE 6 Ct. MIAMI, FL 33137	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$700.00 X
Dwetta Hunter 15401 NE 6 Ave. # B202 MIAMI, FL 33161	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$600.00 X
Rev. Phipps St Hillaire 178 NW 54 Street MIAMI, FL. 33127	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$400.00 X
Carrie Johnson Dames 9220 NW 15 Avenue MIAMI, FL 33147	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$200.00 X
Serge Antonio 30 NW 70 STREET MIAMI, FL 33127	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$150.00 X
Joseph Dumas 7312 NE 48 Street MIAMI, FL 33137	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$150.00 X
Jean Pierre Gaudin 178 NW 54 Street MIAMI, FL. 33127	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$150.00 X

SUBTOTAL of Disbursements This Page (column 4)

4,990.30

TOTAL This Period (Last page and any number of pages)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate categories for each category of the Detailed Summary Page

PAGE 11 OF 16
FORM NO. 100 NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen For Congress

83201388927028

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Cheryl Llanos 1250 NW 174 Street MIAMI, FL. 33169	Consulting Service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$150.00 X
Jeanne Dannie Caicon 544 No. MIAMI AVE #1 MIAMI, FL. 33127	Consulting Service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$80.00 X
Nancy Pierre 144 NE 25 Street MIAMI, FL. 33137	Consulting Service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$80.00 X
Btrick Ferguson 5725 NE 6 Ct. MIAMI, FL 33137	Consulting Service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-5-89	\$80.00 X
Gables Advertising Corp's 165 Aragon Avenue Coral Gables, FL 33134-5770	advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$180.28 X
Tara Tamargo 9330 SW 4E Street MIAMI, FL 33165	Expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$58.90 X
Petty Cash	Petty Cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$500.00 X
Jewish Floridian 120 NE 6 Street MIAMI, FL 33132	Advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$308.00 X
Concerned Seniors of Dade Inc 180 NE 19 Street MIAMI, FL 33132	Advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$150.00 X

NET TOTAL of Disbursements This Page (optional) \$1,587.00

TOTAL This Period (last page this box number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use number (shown) for each category of the Detailed Summary Page
 PAGE 12 OF 16
 FOR LINE NUMBER

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to contact contributors from such committee.

NAME OF COMMITTEE In Full

Ileana Ros-Lehtinen For Congress

9270138127029

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Vote 89 807 SW 25 Avenue Suite 210 MIAMI FL. 33135	Advertising Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$300.00 X
Linda Cherry P.O. Box 1525 GAINVILLE, FL. 32602	consulting service Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$2300.00 X
Romelio Raymond 7955 SW 17 Terrace MIAMI FL. 33155	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$150.00 X
Federal Express 150 Alhambra Circle Coral Gables FL 33134	express mail Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$45.00 X
Susy Lee Hunting Center 393 Piragon Avenue Coral Gables FL. 33134	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$128.19 X
Occidente Magazine 704 SW 17 Avenue Suite 6 MIAMI, FL. 33135	advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$225.00 X
Casa y Caritas 1975 W 54th Street #5004 Hialeah - FL 3312	advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$150.00 X
Pensacola Metropolitan 807 SW 25 Avenue Suite 210 MIAMI, FL 33135	advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$400.00 X
Savali Florida 9500 NW 41 STREET MIAMI FL. 33178	computer supplies Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	8-7-89	\$395.22 X

SUBTOTAL of Disbursements This Page (optional) 4,093.41

TOTAL This Period (last page of this number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use address indicated for each category of the Detailed Summary Page

PAGE 13 OF 16
POLLINE NUMBER

Any information copied from each Return and Disbursement may not be sold or used by any person for the purpose of entering contributions or for campaign purposes, other than using the name and address of any political committee to solicit contributions from such contributor.

NAME OF COMMITTEE (in Full)

Ileana Ros - Lehtinen For Congress

191294508P2570230

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sobak Computer Services 4342 Seagrape Drive Lauderdale k-by-the-Sea, FL 33308	labels Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$225.00 X
Romay Photo Color 1563 NW 27 AVENUE MIAMI FL. 33178	photographs Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$108.00 X
Wendy Donath 4201 South 31 Street Apt. 748 Arlington Virginia 22206	hotel expense Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$312.06 X
Bill Lee 505 2nd Street N.E. Washington D.C. 20002	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$2926.77 X
Michael A. Bausow 4000 Southeast Financial Center MIAMI, FL. 33131-2396	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$250.00 X
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
Daniel's Offset Printing 7-4 SW 4 STREET MIAMI, FL. 33155	printing Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$325.00 X
Dan Morgan 5655 North E Street Arlington, Virginia 22205	consulting service Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$2030.31 X
La Cille 4996 E. 10 Ct. Miami, FL. 33133	advertising Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$350.00 X

SUBTOTAL of Disbursements This Page (actions)

6,527.14

TOTAL This Period (last page this line number on)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

PAGE 14 OF 16 FOR LINE NUMBER

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen For Congress

92040895031
11771381273

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Edy Photo Studio 2485 West Flagler St. Suite 8 MIAMI, FL. 33135	photographs Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$206.70
Angie Printing 4240/4242 West 12 Avenue Hialeah, FL 33012	printing Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$466.40
Angie Printing 4240/4242 West 12 Ave. Hialeah, FL. 33012	printing Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$1266.70
Board of County Commissioners 111 NW 1 Street #1910 MIAMI - FL 33128	lists Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-8-89	\$64.00
Jafra's 1140 SW 67 Avenue MIAMI, FL 33144	office supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-8-89	\$118.95
Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-8-89	\$100.00
US Postmaster 251 Valencia Ave. Coral Gables FL 33134	postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-8-89	\$100.00
Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-8-89	\$1000.00
Force Claudio 150 SW 57 Ave # 36 West MIAMI, FL 33144	supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-9-89	\$141.50

TOTAL of Disbursements This Page (include 1)

\$3464.25

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page
 PAGE 15 of 16
 PER LINE NUMBER

Any information copied from such Records and Disbursements may not be used or used by any person for the purpose of causing contributions to be considered for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros - Lehtinen For Congress

899270148 @ 8 P 570.13 2

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
US Postmaster 257 Valencia Avenue CORAL GABLES, FL 33134	postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-9-89	\$100.00 X
B. Full Name, Mailing Address and ZIP Code Orlando Gonzales 3199 SW 5 Street MIAMI, FL. 33135	photo graphs Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-9-89	\$90.00 X
C. Full Name, Mailing Address and ZIP Code ADVERTISING CONSULTANTS 3605 SW 113TH PLACE MIAMI, FL 33165	ADVERTISING Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89 8-8-89	40,000.00 14,100.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional): \$54,290.00

TOTAL This Period (list page the line number only):

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 16 OF 16
FOR LINE NUMBER

IN KIND CONTRIBUTION

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress

92040895033
R7713841275

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dr. Enrique Lauernia 1500 Hills Blvd. Deerfield Beach, FL	Food / Beverage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-31-89	750.00
Dr. Ivan Lauernia 5100 NE 31 AVENUE Lighthouse Point, FL.	Food / Beverage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	7-31-89	\$750.00
Mary Annice Heinle 9461 SW 148 St. MIAMI, FL 33176	passage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$50.00
Dr. Leonardo Rodriguez 670 SW 24 Road MIAMI, FL	Food Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-7-89	\$167.24

SUBTOTAL of Disbursements This Page (options) 8177.24

TOTAL This Period (last page this line number only) 197,366.67

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION

90 JUL -3 PM 1:36

USE FEC MAILING LABEL OR TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Ileana Ros-Lehtinen for Congress		2. FEC IDENTIFICATION NUMBER C00236976
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 52-2784		
CITY, STATE and ZIP CODE Miami, FL 33152-2784	STATE/DISTRICT FL-18	3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

4. TYPE OF REPORT

- | | |
|---|---|
| <input type="checkbox"/> April 15 Quarterly Report
<input type="checkbox"/> July 15 Quarterly Report
<input type="checkbox"/> October 15 Quarterly Report
<input type="checkbox"/> January 31 Year End Report
<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only) | <input type="checkbox"/> Twelfth day report preceding _____
<small>(Type of Election)</small>
election on _____ in the State of _____
<input checked="" type="checkbox"/> Thirtieth day report following the General Election on
<u>8/29/89</u> in the State of <u>Florida</u>
<input type="checkbox"/> Termination Report |
|---|---|

This report contains activity for Primary Election General Election Special Election Runoff Election

SUMMARY

5. Covering Period <u>8/10/89</u> through <u>9/18/89</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	500,034.77	982,666.04
(b) Total Contribution Refunds (from Line 20(d))	4,350.00	4,350.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	495,684.77	978,316.04
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	479,073.76	983,462.24
(b) Total Offsets to Operating Expenditures (from Line 14)	-0-	-0-
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	479,073.76	983,462.24
8. Cash on Hand at Close of Reporting Period (from Line 27)	22,453.80	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	13,756.66	

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

Type or Print Name of Treasurer Jose M. Martinez-Armesto	
Signature of Treasurer 	Date 6/27/90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

92040895034

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full) Ileana Ros-Lehtinen for Congress	Report Covering the Period: From: 8/10/89 To: 9/18/89
--	--

	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date	
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees			
(i) Itemized (use Schedule A)	331,527.00		11(a)
(ii) Unitemized	-0-		11(b)
(iii) Total of contributions from individuals	331,527.00	712,908.27	11(a)
(b) Political Party Committees	32,000.00	46,000.00	11(b)
(c) Other Political Committees (such as PACs)	135,507.77	222,757.77	11(c)
(d) The Candidate	1,000.00	1,000.00	11(d)
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	500,034.77	982,666.04	11(e)
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	3,600.00	22,600.00	12
13. LOANS:			
(a) Made or Guaranteed by the Candidate	39,000.00	39,000.00	13(a)
(b) All Other Loans	-0-	-0-	13(b)
(c) TOTAL LOANS (add 13(a) and (b))	39,000.00	39,000.00	13(c)
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	-0-	-0-	14
15. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-	15
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	542,634.77	1,044,266.04	16
II. DISBURSEMENTS			
17. OPERATING EXPENDITURES	479,073.76	983,462.24	17
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	-0-	-0-	18
19. LOAN REPAYMENTS:			
(a) Of Loans Made or Guaranteed by the Candidate	34,000.00	34,000.00	19(a)
(b) Of All Other Loans	-0-	-0-	19(b)
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	34,000.00	34,000.00	19(c)
20. REFUNDS OF CONTRIBUTIONS TO:			
(a) Individuals/Persons Other Than Political Committees	4,350.00	4,350.00	20(a)
(b) Political Party Committees	-0-	-0-	20(b)
(c) Other Political Committees (such as PACs)	-0-	-0-	20(c)
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	4,350.00	4,350.00	20(d)
21. OTHER DISBURSEMENTS	-0-	-0-	21
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	517,423.76	1,021,812.24	22

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	(2,757.21)	23
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$	542,634.77	24
25. SUBTOTAL (add Line 23 and Line 24)	\$	539,877.56	25
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$	517,423.76	26
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$	22,453.80	27

92040895035

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

LINE NUMBER 10
(Use separate schedules for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
ILEANA ROS-LENTINEN FOR CONGRESS				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor HEBROCK AND ASSOCIATES 253 E. VIRGINIA ST. TALLAHASSEE, FL 32301	5,673.37	16,862.79	10,362.79	6,500.00
Nature of Debt (Purpose): FUNDRAISING/CONSULTING				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor FLORIDA LUMBER 2431 NW 20TH ST. MIAMI, FL 33142	1,504.70	751.96	-0-	2,256.66
Nature of Debt (Purpose): CAMPAIGN SIGNS				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor COALITIONS, INC. 505 2ND ST. NE WASHINGTON, DC 20002	904.13	-0-	904.13	-0-
Nature of Debt (Purpose): TRAVEL AND OFFICE EXPENSES				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor ADVERTISING CONSULTANTS 3605 SW 113TH PLACE MIAMI, FL 33165	14,837.20	-0-	14,837.20	-0-
Nature of Debt (Purpose): MEDIA PRODUCTION EXPENSE				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				8,756.66
2) TOTAL This Period (last page this line only)				8,756.66
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				5,000.00
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				13,756.66

9
2
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6

SECTION A

ITEMIZED RECEIPTS

Use amount indicated for each category of the Detailed Summary Page

151 1192
FOR LINE NUMBER
1191

IN KIND CONTRIBUTION

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NAME OF COMMITTEE OR FUND

Eleana Ros-Lehtinen for Congress

09720014635087

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Luis Alvarez 9800 NW 25 Street Suite 205 MIAMI, FL 33137	Sextrex Security	9-10-89	\$200.00 Security
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Joe Toledo 2721 West 81st. Hialeah, FL 33016	Dolphin Ice	9-10-89	\$200.00 ice
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mrs. Millie Pepono 2472 NW 21 Terrace MIAMI, FL 33142	Construction Catering	9-10-89	\$620.00 Food
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
NATIONAL Republican Congressional Committee 320 1ST STREET S.E. WASHINGTON D.C. 20003	Congressional Committee	8-29-89	\$500.00 Telephone
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Mrs. Irela Samat 7445 NW 12 Street MIAMI, FL 33166	Kaufman and Roberts	8-28-89	\$569.00 TV + VCR
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation Executive	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
BIPAC 1747 Pennsylvania Ave. N.W. Washington		8-25-89	\$251.32 Lists
Receipt For: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

SUBTOTAL of Receipts This Page (optional)

\$ 340.32

TOTAL This Period (last page this line number only)

SCHEDULE A

ITEM D RECEIPTS

Use separate schedule(s) for each category of the attached Summary Page

PAGE 132 OF 132
FOR LINE NUMBER 111

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NAME OF COMMITTEE (in Full)

ILEANA ROS-LENTINEN FOR CONGRESS

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
DEDUCTIONS FOR INSUFFICIENT FUNDS CHECKS		9/29/89	< 3,200.00
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	Aggregate Year-to-Date > \$	

92040895038

SUBTOTAL of Receipts This Page (optional)	(\$ 200.00)
TOTAL This Period (last page this line number only)	33,517.00

SCHEDULE A

ITEMIZED RECEIPTS

POLITICAL PARTY COMMITTEES

(separate schedule)
for each category of the
Detailed Summary Page

PAGE OF
2 2
FOR LINE NUMBER
11 b

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NAME OF COMMITTEE (in full)

Ileana Ros - Lehtinen for Congress

92040895039

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Republican Party of Florida P.O. Box 311 Tallahassee, FL 32302		8-11-89	\$5000.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		9,500.00
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt this Period
Receipt For: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation		
	Aggregate Year-to-Date > \$		

SUBTOTAL of Receipts This Page (optional)

5,000.00

Total

32,000.00

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule for each category of the Detailed Summary Page

PAGE 1 OF 30

FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen for Congress

92040895040

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
B. Full Name, Mailing Address and ZIP Code Bishop Production Account 2961 SW 87 Avenue Davie, FL 33328	Purpose of Disbursement advertising	Date (month, day, year) 8-10-89	Amount of Each Disbursement This Period \$7,500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
D. Full Name, Mailing Address and ZIP Code Advertising Consultants 3605 SW 113 Place MIAMI; FL 33165	Purpose of Disbursement advertising	Date (month, day, year) 8-10-89	Amount of Each Disbursement This Period \$12,500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code Gables Advertising Concepts 165 Aragon Avenue Coral Gables, FL 33134-5470	Purpose of Disbursement advertising	Date (month, day, year) 8-10-89	Amount of Each Disbursement This Period \$333.90
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code Petty Cash	Purpose of Disbursement petty cash	Date (month, day, year) 8-10-89	Amount of Each Disbursement This Period \$200.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code National Republican Committee 310 1st Street SE Washington D.C. 20003	Purpose of Disbursement President's Expenses	Date (month, day, year) 8-10-89	Amount of Each Disbursement This Period \$17,500.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code Advertising Consultants 3605 SW 113 Place MIAMI; FL 33165	Purpose of Disbursement advertising	Date (month, day, year) 8-11-89	Amount of Each Disbursement This Period \$9,400.00
	Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code Maria V. Garcia 1811 SW 99 Avenue MIAMI; FL 33165	Purpose of Disbursement consulting service	Date (month, day, year) 8-11-89	Amount of Each Disbursement This Period \$750.00
	Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional)

48,183.90

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule(s) for each category of the Detailed Summary Page

PAGE 4 OF 30
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

2
4
5
9
8
0
4
0
2
9

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ivette Maria Chaves 6410 SW 43 ST. MIAMI, FL 33165	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-11-89	\$75.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Arthur Estopi nan 109 NW 49 Ave MIAMI, FL 33126	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-11-89	\$150.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Federal Express 150 Alhambra Circle Coral Gables; FL 33134	express mail Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-11-89	\$12.00
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Greenwings Directo Inc. P.O. Box 1652541 MIAMI FL. 33265	messenger service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-11-89	\$129.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
International Video Projects 250 Bird Road Suite 307 CORAL Gables FL. 33146	video Tape Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-11-89	\$47.70
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dodd Printing 245 West 75 Place Hialeah; FL. 33014	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-12-89	\$2035.20
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Dodd Printing 245 West 75 Place Hialeah; FL. 33014	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-12-89	\$1253.98
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Federal Express 150 Alhambra Circle Coral Gables; FL 33134	express mail Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-12-89	\$15.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Advertising Consultants 3605 SW 113 PLACE MIAMI; FL 33165	advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-12-89	\$15,000.00

SUBTOTAL of Disbursements This Page (optional)

\$18,717.88

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule for each category of the Detailed Summary Page

PAGE 6 OF 130
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

92040895043

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Islander News 104 Crandon Blvd #301 Key Biscayne, FL 33149	advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-15-89	\$676.50
B. Full Name, Mailing Address and ZIP Code Board of County Commissioners 111 NW 1 Street #1910 MIAMI FL. 33128	lists Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-15-89	\$168.02
C. Full Name, Mailing Address and ZIP Code Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-15-89	\$100.00
D. Full Name, Mailing Address and ZIP Code Federal Express 150 Alhambra Circle Coral Gables FL. 33134	express mail Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-15-89	\$51.75
E. Full Name, Mailing Address and ZIP Code Flavor Masters Food Emporium 5400 NW 22 Avenue MIAMI FL 33142	Food Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-15-89	\$424.00
F. Full Name, Mailing Address and ZIP Code City of Coral Gables 365 Aragon Avenue Coral Gables FL 33134	car permits Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-15-89	\$15.90
G. Full Name, Mailing Address and ZIP Code SABAK COMPUTER SERVICES 4342 Seagrave Drive Lauderdale by the Sea FL 33308	computer labels Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-15-89	\$415.00
H. Full Name, Mailing Address and ZIP Code Delta Airlines 231 Alhambra Circle Coral Gables FL 33134	airfare Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-15-89	\$280.00
I. Full Name, Mailing Address and ZIP Code Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-16-89	\$200.00

SUBTOTAL of Disbursements This Page (optional)

\$2,351.17

TOTAL This Period (last page this line number only)

Use this schedule for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

92040895044

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Rev. Phipps St. Hilaire 178 NW 54 Street MIAMI, FL 33127	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-18-89	\$400.00
Carrie Johnson Barber 9220 NW 15 Avenue MIAMI FL 33147	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-18-89	\$200.00
Serge Antoine 30 NW 70 Street MIAMI, FL 33127	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-18-89	\$90.00
Joseph Dumas 7312 NE 48 Street MIAMI, FL 33137	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-18-89	\$90.00
Jean Pierre Osiyas 178 NW 54 Street MIAMI, FL 33127	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-18-89	\$150.00
Cheryl Llanas 1250 NW 174 Street MIAMI, FL 33169	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-18-89	\$150.00
Nancy Pierre 144 NE 25 Street MIAMI, FL 33137	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-18-89	\$96.00
Jeanne Coicou 544 No. Miami Ave #1 MIAMI FL 33127	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-18-89	\$160.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)	\$ 1,336.00
TOTAL This Period (last page this line number only)	

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

92040895045

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$300.00
B. Full Name, Mailing Address and ZIP Code Advertising Consultants 3605 SW 113 Place MIAMI; FL 33165	TV + Radio Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$40,000.00
C. Full Name, Mailing Address and ZIP Code DE FRUENTE 2250 SW 8 Street MIAMI, FL 33135	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$700.00
D. Full Name, Mailing Address and ZIP Code Jaffee's 1140 SW 67 Avenue MIAMI; FL 33144	office supplies Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$132.55
E. Full Name, Mailing Address and ZIP Code Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$200.00
F. Full Name, Mailing Address and ZIP Code Republican National Committee 310 1st Street S.E. Washington D.C. 20003	Airfare Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$732.00
G. Full Name, Mailing Address and ZIP Code Federal Express 150 Alhambra Circle Coral Gables; FL 33134	express mail Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$30.00
H. Full Name, Mailing Address and ZIP Code International Video Products 250 Bird Road #307 Coral Gables FL 33146	video tape Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$26.50
I. Full Name, Mailing Address and ZIP Code Federal Express 150 Alhambra Circle Coral Gables; FL 33134	express mail Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-21-89	\$30.00

SUBTOTAL of Disbursements This Page (optional)

\$42,151.05

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen for Congress

92040895046

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Communication Control Inter. 801 South Bayshore Drive MIAMI, FL 33131</i>	<i>telephone bank</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-21-89</i>	<i>\$14,925.47</i>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Richard Tomkinson. 9841 SW 73 Court MIAMI, FL 33156</i>	<i>expenses</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-21-89</i>	<i>\$296.25</i>
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
	Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)		

SUBTOTAL of Disbursements This Page (optional) *\$15,221.72*

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

92040895047

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Federal Express 150 Alhambra Circle Coral Gables, FL 33134</i>	<i>express mail</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-22-89</i>	<i>\$23.00</i>
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	<i>videos</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-23-89</i>	<i>\$56.30</i>
D. Full Name, Mailing Address and ZIP Code	<i>office rent</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-23-89</i>	<i>\$1000.00</i>
E. Full Name, Mailing Address and ZIP Code	<i>printing</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-23-89</i>	<i>\$1050.00</i>
F. Full Name, Mailing Address and ZIP Code	<i>petty cash</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-23-89</i>	<i>\$1000.00</i>
G. Full Name, Mailing Address and ZIP Code	<i>media production</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-24-89</i>	<i>\$4000.00</i>
H. Full Name, Mailing Address and ZIP Code	<i>expenses</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-24-89</i>	<i>\$300.00</i>
I. Full Name, Mailing Address and ZIP Code	<i>printing</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-24-89</i>	<i>\$795.00</i>

SUBTOTAL of Disbursements This Page (optional)	<i>\$ 8,224.30</i>
TOTAL This Period (last page this line number only)	

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

92040895048

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Aleria 1941 SW 63 Court MIAMI FL. 33155	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-24-89	\$350.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code La Prensa 432 East 9 Street Hialeah FL 33010	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-24-89	\$750.00
D. Full Name, Mailing Address and ZIP Code Southern Bell P.O. Box 02-4000 MIAMI; FL 33102	Telephone service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-24-89	\$705.00
E. Full Name, Mailing Address and ZIP Code Advertising Consultants 3605 SW 113 Place MIAMI; FL 33165	TV + Radio Media Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-24-89	\$5500.00
F. Full Name, Mailing Address and ZIP Code Limelite Video Inc. 7355 NW 1st Street MIAMI; FL 33166	media production Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-24-89	\$665.36
G. Full Name, Mailing Address and ZIP Code U.S. Postmaster 2200 NW 72 Avenue MIAMI; FL	postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-24-89	\$300.00
H. Full Name, Mailing Address and ZIP Code Busy Bee Printing Center 393 Aragon Avenue Coral Gables; FL 33134	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-24-89	\$372.61
I. Full Name, Mailing Address and ZIP Code Miami Herald 1 Herald Plaza MIAMI. FL 33132	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$1784.25

SUBTOTAL of Disbursements This Page (optional)	\$10927.22
TOTAL This Period (last page this line number only)	

Use this page (optional) for a summary of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

92040895049

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Social Security News P.O. Box 45-3324 MIAMI FL 33245-3324	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$1200.00
La Verdad 2150 NW 9 Street MIAMI FL 33135	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$500.00
Acontecer Colombiano 4150 NW 7 Street #205 MIAMI FL 33126	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$300.00
Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$1000.00
So. Florida Review 105 NE 7 Street MIAMI FL 33132	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$200.00
Reinaldas Latin American Cafeteria 5740 SW 27 Avenue MIAMI FL 33133	Food Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$152.00
Advertising Consultants 3605 SW 113 Place MIAMI FL 33165	MEDIA PRODUCTION EXP. Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$14,837.20
Mania V. Garcia 1811 SW 99 Avenue MIAMI FL 33165	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$900.00
Wendy Donath 4201 South 31 Street Apt. 748 Arlington Virginia 22206	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$1050.00

SUBTOTAL of Disbursements This Page (optional) \$20,139.20

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

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NAME OF COMMITTEE (in Full)

Ileana Ros - Lecturer for Congress

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
<i>Freddy Santiago 3430 NW 1 Ave. MIAMI, FL</i>	<i>wood</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$520.00</i>
<i>Miami Paper Hardware 943 West Flagler Street MIAMI FL, 33130</i>	<i>wood</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$115.25</i>
<i>Petty Cash</i>	<i>Poll Workers</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$3000.00</i>
<i>Stewart Bloom + Associates Inc. telephone conference 18715 SW 84 Avenue MIAMI FL 33157</i>	<i>telephone conference</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$725.00</i>
<i>Ralph Echemendia 74 NW 49 Avenue MIAMI, FL 33126</i>	<i>photos</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$350.00</i>
<i>Kim Tisdale 1819 Stamford Circle West Palm Beach, FL 33414</i>	<i>hotel expense</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$303.85</i>
<i>Bill Lee Co. Inc. 505 2nd Street N.E. Washington D.C. 20002</i>	<i>expenses</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$1033.56</i>
<i>Debbie Musgrave 6700 SW 123 Avenue MIAMI FL, 33183</i>	<i>expenses</i> Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$727.43</i>
<i>401 Professional Building Miami - FL 33134</i>	<i>office rent</i> Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	<i>8-28-89</i>	<i>\$1000.00</i>

SUBTOTAL of Disbursements This Page (optional)

\$7,775.09

TOTAL This Period (last page this line number only)

92040895050

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use spaces calculated for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

Ileana Ros - Lecturer For Congress

92040895051

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sabak Computer Services 4342 Seagrape Drive Lauderdale-by-the-Sea, FL 33308	computer labels Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$200.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Diego T. Ruiz 6664 So. Kings Hwy. Alexandria, Virginia 22306	expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$800.00
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Southern Bell P.O. Box 02-4000 MIAMI, FL 33102	telephone service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$1417.50
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Wendy Donath 4201 South 31 Street Apt. 748 Arlington Virginia 22206	hotel expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$377.58
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Caras y Caratas 1975 W 54 Street #8004 Hialeah, FL 33012	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$150.00
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Impressions of Miami 7274 SW 48 Street MIAMI FL 33155	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$189.74
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sabak Computer Services 4342 Seagrape Drive Lauderdale-by-the-Sea, FL 33308	computer labels Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$25.00
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Hebrock and Associates 253 East Virginia Street Tallahassee FL 32301	expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$48.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Los Tiempos P.O. Box 650806 MIAMI, FL 33265	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$200.00

SUBTOTAL of Disbursements This Page (optional)

\$3,407.32

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use expense calculated for each category of the Detailed Summary Page

PAGE 21 OF 30
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros - Lecturer for Congress

92040895052

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Impressions of Miami 7274 SW 48 Street Miami, FL 33155	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$640.97
B. Full Name, Mailing Address and ZIP Code Wendy Donath 4201 South 31 Street Apt 748 Arlington Virginia 22206	hotel expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$348.96
C. Full Name, Mailing Address and ZIP Code Wendy Donath 4201 So. 31 Street Apt. 748 Arlington, Virginia 22206	hotel expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$450.00
D. Full Name, Mailing Address and ZIP Code Flag Center 2187 SW 1 Street MIAMI FL. 33135	Flags Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$36.00
E. Full Name, Mailing Address and ZIP Code Angie Printing 4240/4242 West 12 Avenue dialaah, FL. 33012	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$1176.00
F. Full Name, Mailing Address and ZIP Code Hebrock + Associates 253 East Virginia Street Tallahassee FL. 32301	expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$48.00
G. Full Name, Mailing Address and ZIP Code Universal Travel + Tours 204 South Adams Street Tallahassee FL. 32301	air fare Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$206.00
H. Full Name, Mailing Address and ZIP Code Alonso del Portillo 638 Velarde Avenue Coral Gables; FL 33134	expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$99.87
I. Full Name, Mailing Address and ZIP Code Daniels Offset Printing 7404 SW 41 Street MIAMI FL. 33155	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$708.50

SUBTOTAL of Disbursements This Page (optional)

\$3,714.30

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedules for each category of the Detailed Summary Page

PAGE 23 OF 30
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros - Lecturer for Congress

92040895053

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Ileana Ros Lehtinen 401 Miracle Mile Coral Gables; FL 33134	expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$ 71.50
B. Full Name, Mailing Address and ZIP Code Romay Photo Color 1563 NW 27 Avenue MIAMI FL. 33125	photographs Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$1236.00
C. Full Name, Mailing Address and ZIP Code Photography by Gort 1602 SW 8 St. MIAMI FL. 33142	photographs Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$110.24
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code Coalitions Inc. 505 2ND ST. N.E. Washington D.C. 20002	TRAVEL/OFFICE expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$ 904.13
F. Full Name, Mailing Address and ZIP Code Impressions of Miami 7274 SW 48 Street MIAMI FL. 33155	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$1447.96
G. Full Name, Mailing Address and ZIP Code Dodd Printers 245 West 75 Place Hialeah. FL 33014	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$63.00
H. Full Name, Mailing Address and ZIP Code Impressions of Miami 7274 SW 48 Street MIAMI. FL 33155	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$450.50
I. Full Name, Mailing Address and ZIP Code Glensa Poole 835 NW 87 St. MIAMI. FL 33127	Poll Worker Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$200.00

SUBTOTAL of Disbursements This Page (optional)

4,482.33

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this page (continued) for each category of the Detailed Summary Page

PAGE 24 OF 30
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

92040895054

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Green Ann Printing Corp 928 SW 10 Street MIAMI FL. 33130	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$1125.00
Linda Cherry P.O. Box 1325 Gainesville FL. 32602	telephone service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$8275.00
Hebuck and Associates 253 East Virginia Street Tallahassee FL. 32301	fundraising expenses Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$10,266.79
Federal Express 150 Alhambra Circle Coral Gables FL 33134	express mail Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$12.00
Jorge ARRIZURITA 1300 W. 84 Street Hialeah FL. 33014	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$1200.00
Kristine Ross 1717 No. Bayshore Drive #2036 MIAMI FL 33132	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$1000.00
Benny's Liquor Store 1811 SW 93 Avenue MIAMI FL. 33165	sodas Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$168.79
Advertising Consultants 3605 SW 113 Place MIAMI FL 33165	TV + Radio Media Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$1750.00
Southern Bell P.O. Box 02-4000 MIAMI FL. 33102	telephone service Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$845.09

SUBTOTAL of Disbursements This Page (optional)

\$24,642.67

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen for Congress

92040895055

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Bill Lee Co. Inc 505 2ND STREET N.E. Washington D.C. 20002	expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$1371.90
B. Full Name, Mailing Address and ZIP Code Diego Ruiz 6664 So. Kings Hwy. Alexandria Virginia 22306	expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-30-89	\$1298.06
C. Full Name, Mailing Address and ZIP Code Wendy Donath 4201 South 31 St. Apt. 748 Arlington Virginia 22206	hotel expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-30-89	\$447.56
D. Full Name, Mailing Address and ZIP Code Periodico Horizonte de America 8369 NW 36 Street MIAMI FL. 33136	Advertising Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-31-89	\$275.00
E. Full Name, Mailing Address and ZIP Code Lohie Hines 7601 NW 17 Avenue MIAMI . FL 33147	expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-31-89	\$200.00
F. Full Name, Mailing Address and ZIP Code Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-1-89	\$1000.00
G. Full Name, Mailing Address and ZIP Code Los Tiempos P.O. Box 650806 MIAMI. FL 33265	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-1-89	\$200.00
H. Full Name, Mailing Address and ZIP Code Xiomara Rodriguez 2637 SW 31 Avenue MIAMI . FL 33133	car expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-1-89	\$60.00
I. Full Name, Mailing Address and ZIP Code Hehbierto Fonseca 3355 N.W. 22 COURT MIAMI; FL 33146	 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-1-89	\$400.00

SUBTOTAL of Disbursements This Page (optional)

5,252.52

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen for Congress

92040895056

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Maurice Hernandez 5055 NW 7 St. #211 MIAMI FL. 33126	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-2-89	\$175.00
U.S. Postmaster 2200 NW 72 Avenue MIAMI FL 33152-9998	postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-2-89	\$450.00
Angie Printing 4240/4242 West 12 Avenue Hialeah, FL 33012	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-2-89	\$159.00
U.S. Postmaster 2200 NW 72 Avenue MIAMI FL 33152-9998	postage Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-2-89	\$500.00
Thrifty CAR Rental 2701 NW Lejune Road MIAMI FL	car rental Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-9-89	\$275.28
Maurice Hernandez 5055 NW 7 St. #211 MIAMI FL. 33126	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-9-89	\$75.00
Domingo's PIZZA 5877 France de Leon CORAL GABLES, FL	Food Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-9-89	\$28.67
EL Brazo Fuerte Bakery 1697 SW 37 Avenue MIAMI FL 33145	Food Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-9-89	\$480.00
Paper Wholesaler 2638 SW 23 LANE COCONUT GROVE FL 33133	paper Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$36.59

SUBTOTAL of Disbursements This Page (optional) \$2,179.54

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule for each category of the Detailed Summary Page

PAGE 27 OF 30
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen for Congress

92040895057

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Paper Wholesaler 2638 SW 28 Lane Coconut Grove, FL 33133	Paper Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$46.28
B. Full Name, Mailing Address and ZIP Code Ar-line Morgan 3811 SW 95 Avenue MIAMI, FL 33165	MUSIC Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$400.00
C. Full Name, Mailing Address and ZIP Code Canton Fungwong 9796 SW A Street MIAMI, FL 33174	FOOD Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$100.23
D. Full Name, Mailing Address and ZIP Code La Nacion 1393 SW 1 St. River-side Station MIAMI, FL 33066	advertisement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$1100.00
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code Petty Cash	petty cash Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$10.00
G. Full Name, Mailing Address and ZIP Code Romy Photo 1563 NW 27 Avenue MIAMI, FL 33178	photographs Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$240.00
H. Full Name, Mailing Address and ZIP Code Federal Express 150 Alhambra Circle Coral Gables, FL 33134	express mail Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$15.00
I. Full Name, Mailing Address and ZIP Code Bell South Mobility P.O. Box 105623 ATLANTA GA. 30348-5623	mobile telephone ^{Rental} Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$1114.57

SUBTOTAL of Disbursements This Page (optional)

\$3,026.08

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Ileana Ros Lehtinen For Congress

92040895058

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Greg Glenn P.O. Box 205 Ponte Vedra Beach, FL 33082	hotel expense Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	318.30
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code Patricia P.O. Box 2 MIAMI FL. 33135	Ads Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$600.00
D. Full Name, Mailing Address and ZIP Code Maria V. Garcia 1811 SW 99 Avenue MIAMI FL. 331	consulting service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$675.00
E. Full Name, Mailing Address and ZIP Code Maria V. Garcia 1811 SW 99 Avenue MIAMI- FL 331	expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-11-89	\$20.22
F. Full Name, Mailing Address and ZIP Code Electronics International/Inc. computer 8421 NW 56 STREET MIAMI FLORIDA 33166	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-13-89	\$1500.00
G. Full Name, Mailing Address and ZIP Code Bill Lee Co. Inc. 505 2ND STREET N.E. Washington D.C. 20002	expenses Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-18-89	\$160.69
H. Full Name, Mailing Address and ZIP Code Occidente Magazine 704 SW 17 Avenue #6 MIAMI FL. 33135	Ads. Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-18-89	\$375.00
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

3,649.21

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use this schedule for each category of the Detailed Summary Page

PAGE 30 OF 30
FOR LINE NUMBER 17

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen For Congress

92040895059

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
National Republican Congressional Committee 320 1ST STREET SE Washington D.C. 20003	telephone Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-29-89	\$500.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code Mrs. Irela Saumat 7445 NW 12 STREET MIAMI FL. 33166	TV + VCR Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-28-89	\$569.00
D. Full Name, Mailing Address and ZIP Code BIPAC 1747 Pennsylvania Ave NW. Washington D.C.	Lists Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8-25-89	\$251.32
E. Full Name, Mailing Address and ZIP Code Maria Garcia 1811 SW 99th Avenue MIAMI, FL 33165	TRAVEL EXPENSES Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/29/89	\$280.00
F. Full Name, Mailing Address and ZIP Code SunBank Miami 7905 NW 58th St. MIAMI, FL 33166	SERVICE CHARGES Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	8/29/89	292.39
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

1,892.71

TOTAL This Period (last page this line number only)

479,073.76

REPORT OF RECEIPTS AND DISBURSEMENTS

For An Authorized Committee
(Summary Page)

RECEIVED
FEDERAL ELECTION COMMISSION
WASHINGTON, D.C.

USE FEC MAILING LABEL
OR
TYPE OR PRINT

1. NAME OF COMMITTEE (in full) Ileana Ros-Lehtinen for Congress		90 JUL -3 PM 1:36
ADDRESS (number and street) <input type="checkbox"/> Check if different than previously reported. P.O. Box 52-2784		2. FEC IDENTIFICATION NUMBER C00236976
CITY, STATE and ZIP CODE Miami, FL 33152-2784	STATE/DISTRICT FL-18	3. IS THIS REPORT AN AMENDMENT? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO

4. TYPE OF REPORT

- | | |
|--|--|
| <input type="checkbox"/> April 15 Quarterly Report

<input type="checkbox"/> July 15 Quarterly Report

<input type="checkbox"/> October 15 Quarterly Report

<input checked="" type="checkbox"/> January 31 Year End Report

<input type="checkbox"/> July 31 Mid-Year Report (Non-election Year Only) | <input type="checkbox"/> Twelfth day report preceding _____
<small>(Type of Election)</small>
election on _____ in the State of _____

<input type="checkbox"/> Thirtieth day report following the General Election on _____
in the State of _____

<input type="checkbox"/> Termination Report |
|--|--|

This report contains activity for: Primary Election General Election Special Election Runoff Election

SUMMARY

5. Covering Period <u>9/19/89</u> through <u>12/31/89</u>	COLUMN A This Period	COLUMN B Calendar Year-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))	9,015.00	991,681.04
(b) Total Contribution Refunds (from Line 20(d))	500.00	4,850.00
(c) Net Contributions (other than loans) (subtract Line 6(b) from 6(a))	8,515.00	986,831.04
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17)	23,810.40	1,007,272.64
(b) Total Offsets to Operating Expenditures (from Line 14)	4,005.02	4,005.02
(c) Net Operating Expenditures (subtract Line 7(b) from 7(a))	19,805.38	1,003,267.62
8. Cash on Hand at Close of Reporting Period (from Line 27)	5,163.42	For further information contact: Federal Election Commission 999 E Street, NW Washington, DC 20463 Toll Free 800-424-9530 Local 202-376-3120
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D)	-0-	

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

Type or Print Name of Treasurer
Jose M. Martinez-Armesto

Signature of Treasurer

Date

6/27/90

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

9 2 0 4 0 8 9 5 0 6 0

DETAILED SUMMARY PAGE

of Receipts and Disbursements

(Page 2, FEC FORM 3)

Name of Committee (in full)	Report Covering the Period:	
Ileana Ros-Lehtinen for Congress	From: 9/19/89	To: 12/31/89
I. RECEIPTS	COLUMN A Total This Period	COLUMN B Calendar Year-To-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)	15.00	
(ii) Unitemized	-0-	
(iii) Total of contributions from individuals	15.00	712,923.37
(b) Political Party Committees	-0-	46,000.00
(c) Other Political Committees (such as PACs)	9,000.00	231,757.77
(d) The Candidate	-0-	1,000.00
(e) TOTAL CONTRIBUTIONS (other than loans) (add 11(a)(iii), (b), (c) and (d))	9,015.00	991,681.04
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES.	-0-	22,600.00
13. LOANS:		
(a) Made or Guaranteed by the Candidate	-0-	39,000.00
(b) All Other Loans	-0-	-0-
(c) TOTAL LOANS (add 13(a) and (b))	-0-	39,000.00
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)	4,005.02	4,005.02
15. OTHER RECEIPTS (Dividends, Interest, etc.)	-0-	-0-
16. TOTAL RECEIPTS (add 11(e), 12, 13(c), 14 and 15)	13,020.02	1,057,286.06
II. DISBURSEMENTS		
17. OPERATING EXPENDITURES	23,810.40	1,007,272.64
18. TRANSFERS TO OTHER AUTHORIZED COMMITTEES.	-0-	-0-
19. LOAN REPAYMENTS:		
(a) Of Loans Made or Guaranteed by the Candidate	5,000.00	39,000.00
(b) Of All Other Loans	-0-	-0-
(c) TOTAL LOAN REPAYMENTS (add 19(a) and (b))	5,000.00	39,000.00
20. REFUNDS OF CONTRIBUTIONS TO:		
(a) Individuals/Persons Other Than Political Committees	500.00	4,850.00
(b) Political Party Committees	-0-	-0-
(c) Other Political Committees (such as PACs)	-0-	-0-
(d) TOTAL CONTRIBUTION REFUNDS (add 20(a), (b) and (c))	500.00	4,850.00
21. OTHER DISBURSEMENTS	1,000.00	1,000.00
22. TOTAL DISBURSEMENTS (add 17, 18, 19(c), 20(d) and 21)	30,310.40	1,052,122.64
III. CASH SUMMARY		
23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD	\$	22,453.80
24. TOTAL RECEIPTS THIS PERIOD (from Line 16)	\$	13,020.02
25. SUBTOTAL (add Line 23 and Line 24)	\$	35,473.82
26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)	\$	30,310.40
27. CASH ON HAND AT CLOSE OF THE REPORTING PERIOD (subtract Line 26 from 25)	\$	5,163.42

9 2 0 4 0 3 9 5 0 6 1

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page 1 of 1 for
LINE NUMBER 10
(Use separate schedules
for each numbered line)

Name of Committee (in Full) <i>ILEANA ROS-LENTINE</i> <i>FOR CONGRESS</i>	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>HEBROCK AND ASSOCIATES</i> <i>253 E. VIRGINIA ST.</i> <i>TALLAHASSEE, FL 32301</i>	6,500.00	1,937.50	8,437.50	-0-
Nature of Debt (Purpose): <i>FINANCIAL / CONSULTING</i>				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor <i>FLORIDA LUMBER</i> <i>2431 NW 20TH ST.</i> <i>MIAMI, FL 33142</i>	2,256.66	-0-	2,256.66	-0-
Nature of Debt (Purpose): <i>CAMPAIGN SIGNS</i>				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				-0-
2) TOTAL This Period (last page this line only)				-0-
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				-0-
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				-0-

92040895062

Name of Committee (in Full) ILEANA ROS-LENTINEA FOR CONGRESS				
A. Full Name, Mailing Address and ZIP Code of Loan Source ILEANA ROS-LENTINEA 6005 SW 102ND STREET MIAMI, FL 33156	Original Amount of Loan \$ 39,000.00	Cumulative Payment To Date \$ 39,000.00	Balance Outstanding at Close of This Period \$ -0-	
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate <u>12</u> % (apr) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item A				
1. Full Name, Mailing Address and ZIP Code RECEIVED FROM PERSONAL FUNDS	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
B. Full Name, Mailing Address and ZIP Code of Loan Source				
		Original Amount of Loan	Cumulative Payment To Date	Balance Outstanding at Close of This Period
Election: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):				
Terms: Date Incurred _____ Date Due _____ Interest Rate _____ % (apr) <input type="checkbox"/> Secured				
List All Endorsers or Guarantors (if any) to Item B				
1. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
2. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
3. Full Name, Mailing Address and ZIP Code	Name of Employer			
	Occupation			
	Amount Guaranteed Outstanding: \$			
SUBTOTALS This Period This Page (optional)			-0-	
TOTALS This Period (last page in this line only)			-0-	

92040895063

Carry outstanding balance only to LINE 3, Schedule D, for this line. If no Schedule D, carry forward to appropriate line of Summary.

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress C00236976

92040895064

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Tom Anderson for Congress P.O. Box 1772 Gulfport, MS 39502	contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-20-89	\$1000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code Florida Lumber Co. 2431 N.W. 20th St. Miami, FL 33142	signs Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-21-89	\$2256.66 X
D. Full Name, Mailing Address and ZIP Code Angie Printing 4240/4242 West 12th Ave. Hialeah Squares Shopping Ctr. Hialeah, FL 33012	printing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-21-89	\$1060.00 X
E. Full Name, Mailing Address and ZIP Code Dial Page Inc. 3638 West Flagler St. Miami, FL 33135	beeper Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-21-89	\$73.63 X
F. Full Name, Mailing Address and ZIP Code Tara Tamargo P.O. Box 10542 Burke, VA 22015-0542	consulting Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-21-89	\$150.00 X
G. Full Name, Mailing Address and ZIP Code Romay Photo Color Portofino II Shopping Ctr. 1563 N.W. 27th Ave. Miami, FL 33125	photos Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-21-89	\$240.00 X
H. Full Name, Mailing Address and ZIP Code Clerk of the County Court 2801 Salzedo St. Coral Gables, FL	parking ticket Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-21-89	\$10.00 X
I. Full Name, Mailing Address and ZIP Code Travel Depot 11880 Bird Rd. Miami, FL 33175	ticket Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-27-89	\$403.00 X

SUBTOTAL of Disbursements This Page (optional)

5,193.29

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress C00236976

92040895065

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Sunshine State Messenger Svc. 6775 N.W. 15th Ave. Fort Lauderdale, FL	messenger services Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$8.60 X
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code Telesound Systems Corp. 8422 N.W. 36th St. Miami, FL 33166	phone Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$424.00 X
D. Full Name, Mailing Address and ZIP Code Stanley Tate P.O. Box 611603 North Miami, FL 33261-1603	breakfast Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$135.00 X
E. Full Name, Mailing Address and ZIP Code Romay Photo Color Portofino II Shopping Ctr. 1563 N.W. 27th Ave. Miami, FL 33125	photo Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$30.00 X
F. Full Name, Mailing Address and ZIP Code Casablanca Banquet Hall 855 S.W. 22nd Ave. Miami, FL 33135	room rental, food Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$788.64 X
G. Full Name, Mailing Address and ZIP Code Able Builders Equipment P.O. Box 660068 Miami, FL 33266-0068	equipment Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$127.20 X
H. Full Name, Mailing Address and ZIP Code 401 Professional Bldg. Miami, FL 33134	office rental Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$577.00 X
I. Full Name, Mailing Address and ZIP Code Federal Express 150 Alhambra Circle Coral Gables, FL 33134	express mailing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$15.00 X

SUBTOTAL of Disbursements This Page (optional)

2105.44

TOTAL This Period (last page this line number only)

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NAME OF COMMITTEE (in Full)
Ileana Ros-Lehtinen for Congress C00236976

92040895066

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
The Miami Herald 1 Herald Plaza Miami, FL	photo Disbursement for: <input checked="" type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$30.66
B. Full Name, Mailing Address and ZIP Code Trias Florist 3434 West Flagler St. Miami, FL	flowers Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$211.13 X
C. Full Name, Mailing Address and ZIP Code Humana Medical Plan 1505 N.W. 167th St. Miami, FL 33169	returned contribution Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	9-30-89	\$500.00 X
D. Full Name, Mailing Address and ZIP Code Ileana Ros-Lehtinen 8421B N.W. 56th St. Miami, FL 33166	loan repayment Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-15-89	\$5000.00 X
E. Full Name, Mailing Address and ZIP Code Holareo Exposito 320 S.W. 51st Ave. Miami, FL 33134	chair rental Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-15-89	\$485.00 X
F. Full Name, Mailing Address and ZIP Code Rafael Acosta 2207 West 53rd Pl. Hialeah, FL 33016	election day work Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-15-89	\$29.70 X
G. Full Name, Mailing Address and ZIP Code Romay Photo Color Portofino II Shopping Ctr. 1563 N.W. 27th Ave. Miami, FL 33125	photos Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-15-89	\$85.00 X
H. Full Name, Mailing Address and ZIP Code My Travel Agency 4717 N.W. 79th Ave. Miami, FL	travel arrangements Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-25-89	\$2277.19 X
I. Full Name, Mailing Address and ZIP Code Stanlèy Tate P.O. Box 611603 North Miami, FL 33261-1603	breakfast host Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	10-15-89	\$210.86 X

SUBTOTAL of Disbursements This Page (optional)

8,029.54

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Use separate schedule for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress C00236976

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Hebrock & Assoc. 253 East Virginia St. Tallahassee, FL 32301	consulting Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	10-15-89	\$8437.50 X
B. Full Name, Mailing Address and ZIP Code Amanda Ros 8421B N.W. 56th St. Miami, FL 33166	rental cars, hotels Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	10-15-89	\$1544.75 X
C. Full Name, Mailing Address and ZIP Code Ted Hoepner Sun Bank/Miami N.A. 777 Brickell Ave. Miami, FL	reception Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	10-18-89	\$943.29 X
D. Full Name, Mailing Address and ZIP Code Richard Tonkinson 9841 S.W. 73rd Ct. Miami, FL 33156	reimbursement Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	10-19-89	\$752.45 X
E. Full Name, Mailing Address and ZIP Code Federal Express 150 Alhambra Circle Coral Gables, FL 33134	express mailing Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	10-26-89	\$34.50 X
F. Full Name, Mailing Address and ZIP Code Margie Garcia 1811 S.W. 99th Ave. Miami, FL 33165	 Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	10-24-89	\$84.26 X
G. Full Name, Mailing Address and ZIP Code	 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)		
H. Full Name, Mailing Address and ZIP Code	 Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General Other (specify)		
I. Full Name, Mailing Address and ZIP Code AT&T 1 Concourse Parkway, Suite 300 Atlanta, GA 30328	long distance service Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General Other (specify)	11-11-89	\$5.00 X

SUBTOTAL of Disbursements This Page (optional)

11,801.75

TOTAL This Period (last page this line number only)

92040895067

SCHEDULE B

ITEMIZED DISBURSEMENTS

(Use separate schedule(s) for each category of the Detailed Summary Page

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NAME OF COMMITTEE (in Full)

Ileana Ros-Lehtinen for Congress C00236976

92040895068

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
Southern Bell P.O. Box 024000 Miami, FL 33102-4000	phone charges Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11-11-89	\$1262.10 X
B. Full Name, Mailing Address and ZIP Code Ros Forwarding 8420 N.W. 58th St. Miami, FL 33166	rent Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11-11-89	\$469.73 X
C. Full Name, Mailing Address and ZIP Code Alonso del Portillo 638 Verlarde Ave. Coral Gables, FL 33134	consulting Disbursement for: <input type="checkbox"/> Primary <input checked="" type="checkbox"/> General <input type="checkbox"/> Other (specify)	11-20-89	\$648.55 \
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify)	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

\$2380.38

TOTAL This Period (last page this line number only)

30,310.40

WILLIAM & ROBIN KASKEL
5881 Southwest 105th Street
Miami, Florida 33156

June 5, 1990

Mr. Keith Davis
Huckaby & Associates
228 South Washington Street
Suite 200
Alexandria, VA 22314

Dear Mr. Davis:

This letter will serve to clarify any discrepancy concerning our contributions to the Ileana Ros-Lehtinen for Congress campaign committee in 1989.

Check #146 (copy enclosed) drawn on our joint account and dated August 25, 1989 represents the total of all contributions we made to Rep. Ros-Lehtinen's campaign in 1989. Subsequent to our sending this check, we were requested to designate that this contribution would be divided equally between the two of us. We again confirm with this letter that an equal allocation to each of us is our intent.

We have been informed that the Federal Election Committee report as filed by the Ros-Lehtinen for Congress committee covering the period of August 10, 1989 through September 18, 1989 indicates that an in-kind donation for food of \$1,000.00 was received from Mrs. Robin Kaskel. However, there was no in-kind donation of any type or amount made by either of us at any time during the campaign, and we understand that the campaign will be filing an amended report which will accurately reflect that our contributions consisted of this one check for \$2,000.00 divided equally between us.

We trust that this letter clarifies any uncertainty on the part of the FEC regarding our donations to Rep. Ros-Lehtinen's 1989 campaign committee.

Sincerely,


Mr. William Kaskel

Sincerely,


Mrs. Robin Kaskel

WK-RK/lc
Encl.

92040895069

WILLIAM & ROBIN KASKEL
5881 Southwest 105th Street
Miami, Florida 33156

June 5, 1990

Mr. Keith Davis
Huckaby & Associates
228 South Washington Street
Suite 200
Alexandria, VA 22314

Dear Mr. Davis:

This letter will serve to clarify any discrepancy concerning our contributions to the Ileana Ros-Lehtinen for Congress campaign committee in 1989.

Check #146 (copy enclosed) drawn on our joint account and dated August 25, 1989 represents the total of all contributions we made to Rep. Ros-Lehtinen's campaign in 1989. Subsequent to our sending this check, we were requested to designate that this contribution would be divided equally between the two of us. We again confirm with this letter that an equal allocation to each of us is our intent.

We have been informed that the Federal Election Committee report as filed by the Ros-Lehtinen for Congress committee covering the period of August 10, 1989 through September 18, 1989 indicates that an in-kind donation for food of \$1,000.00 was received from Mrs. Robin Kaskel. However, there was no in-kind donation of any type or amount made by either of us at any time during the campaign, and we understand that the campaign will be filing an amended report which will accurately reflect that our contributions consisted of this one check for \$2,000.00 divided equally between us.

We trust that this letter clarifies any uncertainty on the part of the FEC regarding our donations to Rep. Ros-Lehtinen's 1989 campaign committee.

Sincerely,



Mr. William Kaskel

Sincerely,



Mrs. Robin Kaskel

WK-RK/lc
Encl.

92040895070

AM KASKEL
VIN KASKEL
WEST 30TH STREET
MIAMI, FL 33186

8/25 089

148
68-58/000

Pay to the
order of Los Lehtinen for Congress \$ 2,000
Two thousand dollars or 2000 Dollars

● Southeast Bank, N.A.
WEST DADE BANKING CENTER 2113
2201 NORTHWEST 36TH STREET
MIAMI, FLORIDA 33186

SECURITY PLUS

Name _____

Wm Kaskel

9 2 0 4 0 8 9 5 0 7 1

WILLIAM AND ROBIN KASKEL
5881 Southwest 105th Street
Miami, Florida 33156
305-661-6536

August 30, 1989

Ros Lehtinen for Congress
401 Miracle Mile, Suite 401
Coral Gables, FL 33134
Attn: Mr. Frank Hebrock

To whom it may concern:

With reference to our check #146 in the amount of \$2,000.00 payable to Ros Lehtinen for Congress dated August 28, 1989, \$1,000.00 or one-half (1/2) was donated on my behalf.

Sincerely,



Mrs. William (Robin) Kaskel

RK/lc



92040895072



FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

July 19, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Geroge Hyde, General Manager
W.Q.B.A. - AM 1140
2828 Coral Way
Miami, Florida 33145-3204

RE: MUR 3054

Dear Mr. Hyde;

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Office of the General Counsel requests your assistance and asks that you provide information regarding the transaction outlined below in connection with an investigation it is conducting. You are not considered a respondent in this matter but rather a witness only.

On August 24, 1989, the Republican Party of Dade County made an expenditure of \$2,800 to you, reportedly for radio advertisements. Please provide this Office with all documents relating to this transaction, including copies of scripts and invoices.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 3760-5690, toll free (800) 424-9530, or FAX 202-376-5280.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Berner
Associate General Counsel

92040895073



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 19, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Maria Rosa, Office Manager
Sanchez & Levitan
1800 S.W. 27th Avenue
Miami, Florida 33145

RE: MUR 3054

Dear Sir/Madam;

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Office of the General Counsel requests your assistance and asks that you provide information regarding the transaction outlined below in connection with an investigation it is conducting. You are not considered a respondent in this matter but rather a witness only.

On August 25, 1989, the Republican Party of Dade County made an expenditure of \$2,000.00 to you, reportedly for a Get-Out-The-Vote mailing and radio advertisements. Please provide this Office with all documents relating to this transaction, including copies of scripts, printed materials, and invoices.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690, toll free (800) 424-9530, or FAX 202-376-5280.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
Lois G. Lerner
Associate General Counsel

92040395074



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Charles Fernandez, Exec. Vice President
W.A.Q.I. - AM 710
2960 Coral Way
Miami, Florida 33145

RE: MUR 3054

Dear Mr. Fernandez;

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Office of the General Counsel requests your assistance and asks that you provide information regarding the transaction outlined below in connection with an investigation it is conducting. You are not considered a respondent in this matter but rather a witness only.

On August 24, 1989, the Republican Party of Dade County made an expenditure of \$2,400.00 to you, reportedly for radio advertisements. Please provide this Office with all documents relating to this transaction, including copies of scripts and invoices.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690, toll free (800) 424-9530, or FAX 202-376-5280.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

92040895075



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Omar Vaillant, Director
W.R.H.C - AM 1550
330 S.W. 27th Avenue
Miami, Florida 33135

RE: MUR 3054

Dear Mr. Vaillant;

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Office of the General Counsel requests your assistance and asks that you provide information regarding the transaction outlined below in connection with an investigation it is conducting. You are not considered a respondent in this matter but rather a witness only.

On August 24, 1989, the Republican Party of Dade County made an expenditure of \$1,600.00 to you, reportedly for radio advertisements. Please provide this Office with all documents relating to this transaction, including copies of scripts and invoices.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 3760-5690, toll free (800) 424-9530, or FAX 202-376-5280.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Lerner
Associate General Counsel

92040895076



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 19, 1990

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Dodd Printers, Inc.
245 West 75 Place
Hialeah, Florida 33014

RE: MUR 3054

Dear Sir/Madam;

The Federal Election Commission has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, United States Code. The Office of the General Counsel requests your assistance and asks that you provide information regarding the transaction outlined below in connection with an investigation it is conducting. You are not considered a respondent in this matter but rather a witness only.

On August 25, 1989, the Republican Party of Dade County made an expenditure of \$948.70 to you, reportedly for a campaign mailing. Please provide this Office with all documents relating to this transaction, including copies of printed materials and invoices.

Because this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provision of 2 U.S.C. § 437g(a)(12)(A) applies. That section prohibits making public any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made. You are advised that no such consent has been given in this case.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690, toll free (800) 424-9530, or FAX 202-376-5280.

Sincerely,

Lawrence M. Noble
General Counsel

BY: Lois G. Berner
Associate General Counsel

92040895077

0627069



RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL

90 JUL 26 PM 3:58

HOUSE OF REPRESENTATIVES

July 25, 1990

ILEANA ROS-LEHTINEN

P.O. Box 52-2784
Miami, FL 33152-2784

Mr. Lawrence Noble
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

Re: MUR 3054 Interrogatories and
Request for Documents

Dear Mr. Noble:

On behalf of the Ileana Ros-Lehtinen for Congress Committee (FEC ID #C00236976) and its Treasurer, Jose M. Martinez-Armesto, I hereby respond to the Interrogatories and Request for Documents in the matter of MUR 3054. We received your most recent letter (dated June 27, 1990), on July 11, 1990.

As you are probably aware, the Committee has now amended its FEC reports for the 1989 filing periods. As a result, the first report filed after the August 1 special primary, which covered activity through August 9, indicated an outstanding debt remaining of \$ 22,919.40. The subsequent amended report, covering activity through September 18, 1990, reflects a debt outstanding of \$ 13,756.66. The Committee had no amounts receivable as of August 1, nor as of any later filing date.

Question 1. As of August 1, 1989, the Committee's overall cash-on-hand was \$ 76,598.59. Of this amount, the total available from funds received for the August 1, 1989 special primary election was \$ 67,448.59. The "total amount of unpaid debts and obligations incurred with respect to the primary election", i.e., incurred on or before August 1st, or relating to activity for the primary election, but paid after August 1st, totaled \$ 78,041.34. An itemization of these unpaid debts and obligations follows:

<u>VENDOR</u>	<u>AMOUNT DUE</u>	<u>DATE INCURRED</u>	<u>CHECK#</u>
Photography by Gort	\$ 25.44	6/20/89	1533
Glenda Pool	200.00	8/1/89	1540
Bishop & Associates	6,000.00	primary	1304
Hebrock & Associates	5,589.37	through 8/1/89	1543
Ted Hoepner	225.09	7/14	1629
Ileana Ros-Lehtinen	953.95	7/3	1315
Gables	114.72	7/28/89	1288
Wendy Donath	283.20	7/24/89-7/31/89	1314
Hebrock & Associates	20,000.00	7/27/89	1302/1303
Thomas Tew/Tew Jordan	1,710.58	June/July 1989	1313

92040395078

Debbie Musgrove	276.09	7/1/89-7/31/89	1510
Southern Bell	330.63	through 8/1/89	1551
Florida Lumber Company	954.67	through 8/1/89	1585
Edy Photos Studio	206.70	7/20/89	1355
La Calle	350.00	7/28/89	1354
Dan Morgan	2,030.31	7/28/89	1353
Angie Printing	1,266.70	7/25 & 7/26/89	1358
Caras & Caretas	150.00	7/14/89	1343
Panorama Metropolitano	400.00	7/28/89	1344
Savin Florida	395.22	7/26 & 7/27/89	1345
Sabak Computer	225.00	7/18/89	1346
Wendy K. Donath	83.70	through 8/1/89	1348
William Lee & Company	2,926.77	through 8/1/89	1349
Bus Bench Company	9,545.44	8/1/89	1287
Michael A. Barrow	250.00	through 8/1/89	1350
William Lee & Company	160.78	8/1/89	1509
Southern Bell	1,416.88	through 8/1/89	1514
Daniel's Offset Printing	325.00	7/7/89	1352
Hebrock & Associates	48.00	7/24-7/27/89	1526
Hebrock & Associates	36.00	7/27-7/31	1519
Alonso del Portillo	52.39	through 8/1/89	1528
Coalitions, Inc.	904.13	through 7/31/89	1536
Trias Florists	70.86	through 8/1/89	1615
Sunshine Messengers	8.60	7/31/89	1602
Advertising Consultants	14,837.20	7/17-7/31/89	199279
Bell South Mobility	7.19	7/19-7/25/89	1583
Linda Cherry	2,300.00	through 8/1	1338
Louis Zayas	60.00	payroll thru 8/1	1300
Maurice Hernandez	80.00	payroll thru 8/1	1309
Tara Tamargo	130.00	payroll thru 8/1	1310
Alonso del Portillo	673.82	payroll thru 8/1	1311
Wendy Donath	1,090.91	payroll thru 8/1	1312
Thomas Ferguson	280.00	payroll thru 8/1	1320
Dwetta Hunter	240.00	payroll thru 8/1	1321
Phipps St. Hilaire	160.00	payroll thru 8/1	1322
Carrie Johnson Barbes	80.00	payroll thru 8/1	1323
Serge Antoine	60.00	payroll thru 8/1	1324
Joseph Dumas	60.00	payroll thru 8/1	1325
Jean Pierre	60.00	payroll thru 8/1	1326
Cheryl Llanos	60.00	payroll thru 8/1	1327
Jeanne Darrie	32.00	payroll thru 8/1	1328
Nancy Pierre	32.00	payroll thru 8/1	1329
Patrick Ferguson	32.00	payroll thru 8/2	1330
Maria V. Garcia	125.00	payroll thru 8/1	1376
Mauricio Tamargo	125.00	payroll thru 8/1	1377

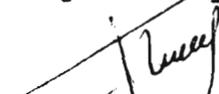
Total: \$ 78,041.34

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Question 2. Of the four contributions listed in the "Interrogatories and Request for Documents", only the contribution from the Republican Party of Florida for \$5,000.00 was used as an adjustment against the primary debt.

Question 3. With the exception of the payroll amounts, invoices for the bills listed in the response to Question 1, along with front and back copies of the payment checks made out to each vendor, are attached. There is no invoice for the payroll checks issued.

Respectfully submitted:


Jose M. Martinez-Armesto
Treasurer
Ileana Ros-Lehtinen for Congress

encls.

92040395080

NUMEROUS RECORDS FILED BY ILEANA ROS-LEHTINEN FOR CONGRESS COMMITTEE IN RESPONSE TO FEC REQUEST FOR DOCUMENTS HAVE NOT BEEN PLACED ON THE PUBLIC RECORD. THEY HAVE BEEN RETAINED IN THE OFFICE OF GENERAL COUNSEL AND ARE AVAILABLE, UPON REQUEST, FOR REVIEW AND COPYING.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 31, 1990

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2784
Miami, FL 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as treasurer

Dear Mr. Martinez-Armesto

On July 26, 1990, the Commission received your response to the interrogatories relating to the net debts outstanding of the Ileana Ros-Lehtinen for Congress committee ("the Committee") regarding the special primary election in 1989.

In that response you state that of the four contributions identified in the interrogatories, only the \$5,000 contribution from the Republican Party of Florida was used to adjust the primary debt. Based on this response, a point requires clarification.

Reports filed with the Commission disclose that the Special Congressional Election Fund transfers \$19,000 to the Committee on August 7, 1989, and \$3,600 on August 16, 1990. Included in the funds transferred were \$5,000 contributions each from the Republican National Committee and the National Republican Congressional Committee. Please clarify whether the Committee viewed the transfers from the Special Congressional Election Fund as constituting primary election contributions or general election contributions.

92040895082

Jose M. Martinez-Armesto
Page 2

If you have any questions, please contact Jeffrey D. Long,
the staff member assigned to this matter, at (202) 376-5690.

Sincerely

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

92040895083



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 13, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Omar Vaillant, Director
W.R.H.C. - AM 1550
330 S.W. 27th Avenue
Miami, Florida 33135

RE: MUR 3054

Dear Mr. Vaillant:

On July 19, 1990, the Federal Election Commission sent you a set of interrogatories and requests for documents as a nonrespondent witness in a matter under investigation by the Commission. A copy of this document is enclosed. The interrogatories and requests for documents requested your response within 15 days of receipt.

To date, we have not received your response to the interrogatories and requests for documents. You should contact the Office of the General Counsel immediately. If your response to the interrogatories and requests for documents is not received within 10 days of your receipt of this letter, this Office will consider recommending that the Commission issue a subpoena and order for the requested information.

Should you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in cursive script, appearing to read "George F. Rishel".

BY: George F. Rishel
Assistant General Counsel

92040895084



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 13, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George Hyde, General Manager
W.Q.B.A. - AM 1140
2828 Coral Way
Miami, Florida 33145-3204

RE: MUR 3054

Dear Mr. Hyde:

On July 19, 1990, the Federal Election Commission sent you a set of interrogatories and requests for documents as a nonrespondent witness in a matter under investigation by the Commission. A copy of this document is enclosed. The interrogatories and requests for documents requested your response within 15 days of receipt.

To date, we have not received your response to the interrogatories and requests for documents. You should contact the Office of the General Counsel immediately. If your response to the interrogatories and requests for documents is not received within 10 days of your receipt of this letter, this Office will consider recommending that the Commission issue a subpoena and order for the requested information.

Should you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

George F. Rishel
BY: George F. Rishel
Assistant General Counsel

92040895085



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

August 13, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Dodd Printers, Inc
245 West 75 Place
Hialeah, Florida 33014

RE: MUR 3054

Dear Sir/Madam:

On July 19, 1990, the Federal Election Commission sent you a set of interrogatories and requests for documents as a nonrespondent witness in a matter under investigation by the Commission. A copy of this document is enclosed. The interrogatories and requests for documents requested your response within 15 days of receipt.

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Should you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: George F. Rishel
Assistant General Counsel

92040895086



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 13, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Fernandez, Exec. Vice President
W.A.Q.I. - AM 710
2960 Coral Way
Miami, Florida 33145

RE: MUR 3054

Dear Mr. Fernandez:

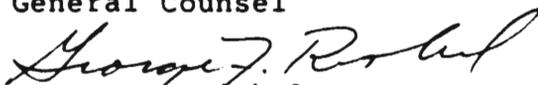
On July 19, 1990, the Federal Election Commission sent you a set of interrogatories and requests for documents as a nonrespondent witness in a matter under investigation by the Commission. A copy of this document is enclosed. The interrogatories and requests for documents requested your response within 15 days of receipt.

To date, we have not received your response to the interrogatories and requests for documents. You should contact the Office of the General Counsel immediately. If your response to the interrogatories and requests for documents is not received within 10 days of your receipt of this letter, this Office will consider recommending that the Commission issue a subpoena and order for the requested information.

Should you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
George F. Rishel
Assistant General Counsel

920408895087



FEDERAL ELECTION COMMISSION
WASHINGTON, DC 20463

August 13, 1990

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Maria Rosa, Office Manager
Sanchez & Levitan
1800 S.W. 27th Avenue
Miami, Florida 33145

RE: MUR 3054

Dear Ms. Rosa:

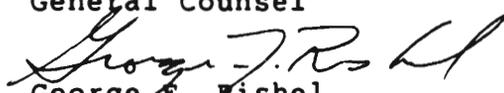
On July 19, 1990, the Federal Election Commission sent you a set of interrogatories and requests for documents as a nonrespondent witness in a matter under investigation by the Commission. A copy of this document is enclosed. The interrogatories and requests for documents requested your response within 15 days of receipt.

To date, we have not received your response to the interrogatories and requests for documents. You should contact the Office of the General Counsel immediately. If your response to the interrogatories and requests for documents is not received within 10 days of your receipt of this letter, this Office will consider recommending that the Commission issue a subpoena and order for the requested information.

Should you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

BY: 
George F. Rishel
Assistant General Counsel

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August 20, 1990

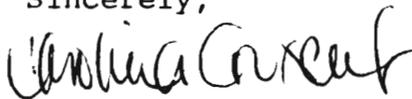
Mr. Jeffrey Long
Federal Election Commission
Washington, D.C. 20463

Dear Mr. Long:

Enclosed please find all materials in reference to MUR 3054 for the Republican Party of Dade County. I have enclosed the scripts our agency wrote for the radio spots as well as the invoice for our services.

If you should require anything further, please feel free to call me.

Sincerely,



Carolina Cruxent
Account Coordinator

/cc

Enclosures

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 21 PM 12:07

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SANCHEZ & LEVITAN
ADVERTISING/PUBLIC RELATIONS
1800 SOUTHWEST 27 AVENUE, FIFTH FLOOR
MIAMI, FLORIDA 33115
305 / 442-1586
FAX 442-2598

Republican Party of Dade County
Att'n: Maria Alonso-Martinez
2905 Salzedo Street
Coral Gables, FL 33134

Date: 8/25/89

Invoice#: 16554

FOR PROFESSIONAL SERVICES RENDERED AND EXPENSES INCURRED AS FOLLOWS:

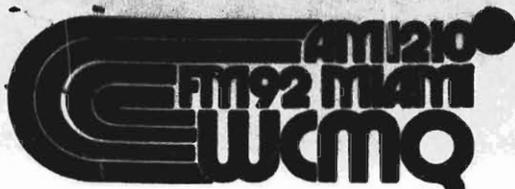
VOTER REGISTRATION CAMPAIGN 1989

Copywriting and media placement services 2,000

TOTAL INVOICE \$2,000

PAYMENT DUE UPON RECEIPT FOR ALL MEDIA PLACEMENT

92040895090



1411 Coral Way
Miami, Florida 33145
(305) 854-1830

AM
 FM

INVOICE NUMBER: 89480	DATE: 8/27/89	PAGE: 1
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INVOICE

ORDER NO: 4199
SALESREP MARY MAYORAL

AGENCY NO: 617
ADVERT NO: 2658
ADVERTISER: REPUBLICAN PARTY
PRODUCT: REPUBLICAN PARTY

SANCHEZ LEVITAN
2100 CORAL WAY
SUITE 401
MIAMI

FL 33145

DATE	DAY	STATION	TIME	LENGTH	CLASS	W/G FOR	DESCRIPTION	TIME CHARG
8/25	FRI	WCMQ-AM	845P	30				
8/25	FRI	WCMQ-AM	945P	30				
8/26	SAT	WCMQ-AM	912A	30				
8/26	SAT	WCMQ-AM	624P	30				
8/27	SUN	WCMQ-AM	724A	30				
8/27	SUN	WCMQ-AM	424P	30				
SUMMARY: SPOTS CLASS LTH 6 30 GROSS CHARGES LESS AGENCY COMMISSION AT 15.00% NET DUE								TOTAL 352.92 352.92 52.94 299.98

9204089509

Dejesita Cruz

NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP SEPT. 28, 1992
BONDED THRU GENERAL INS. UND.

THIS IS TO CERTIFY THE ABOVE WAS BROADCAST ON RADIO STATION WCMQ AT THE TIMES SPECIFIED ACCORDING TO THE DAILY BROADCAST LOG.

BY *Ed Medina*



1411 Coral Way
Miami, Florida 33145
(305) 854-1830

AM
 FM

INVOICE NUMBER	DATE	PAGE
89576	8/27/89	1

INVOICE

ORDER NO: 4199
SALESREP MARY MAYORAL

AGENCY NO: 617
ADVERT NO: 2658
ADVERTISER: REPUBLICAN PARTY
PRODUCT: REPUBLICAN PARTY

SANCHEZ LEVITAN
2100 CORAL WAY
SUITE 401
MIAMI

FL 33145

DATE	DAY	STATION	TIME	LENGTH	CLASS	SPOTS	DESCRIPTION	TIME CHARGE
8/25	FRI	WCMQ-FM	921P	30				
8/25	FRI	WCMQ-FM	1040P	30				
8/26	SAT	WCMQ-FM	914A	30				
8/26	SAT	WCMQ-FM	612P	30				
8/27	SUN	WCMQ-FM	1124A	30				
8/27	SUN	WCMQ-FM	413P	30				

SUMMARY:	SPOTS	CLASS	LTH	TOTAL
	4		30	352.92
			GROSS CHARGES	352.92
			LESS AGENCY COMMISSION AT 15.00%	52.94
			NET DUE	299.98

Dorothy Cruz
NOTARY PUBLIC STATE OF FLORIDA
MY COMMISSION EXP. SEPT. 26, 1992
BONDED THRU GENERAL INS. UND.

9204039509

THIS IS TO CERTIFY THE ABOVE WAS BROADCAST ON RADIO STATION WCMQ AT THE TIMES SPECIFIED ACCORDING TO THE DAILY BROADCAST LOG.

BY *E. Cruz*

RADIO COPY

AUGUST 24, 1989 - REPUBLICAN PARTY - JOB NO.

POLITICAL ANNOUNCEMENT - "ALBERTO CARDENAS" - SPANISH :30

(CARDENAS)

TE HABLA ALBERTO CARDENAS. EL MARTES, 29 DE AGOSTO HAY ELECCIONES PARA EL CONGRESO FEDERAL, EL SENADO Y LA LEGISLATURA ESTATAL.

EN JUEGO ESTAN MAS QUE UNAS ELECCIONES. TODOS SABEMOS EL AGRAVIO QUE HEMOS SUFRIDO RECIENTEMENTE.

AHORA, MAS QUE NUNCA, DEBES VOTAR...PARA QUE NOS RESPETEN. SI NECESITAS TRANSPORTE, LLAMA AL 443-1676.

EL MARTES DAREMOS UN PASO ADELANTE O HACIA ATRAS. TODO DEPENDE DE TU VOTO.

VOTA POR TUS CANDIDATOS REPUBLICANOS. MUCHAS GRACIAS.

(ANNCR)

Anuncio Político Pagado por el Partido Republicano del Condado de Dade.

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RADIO :30

SENADOR

~~REPRESENTANTE~~ JAVIER SOUTO

SENADOR

LE HABLA SU ~~REPRESENTANTE~~ JAVIER SOUTO DEL DISTRITO 40.

ESTE MARTES 29 DE AGOSTO, HAGA OIR SU VOZ CON ^{SU}~~EL~~ VOTO.

ASEGURE LA ELECCION DE CANDIDATOS REPUBLICANOS AL CONGRESO FEDERAL ASI COMO AL SENADO Y LEGISLATURA ESTATALES. ELLOS REPRESENTAN SUS VALORES Y SUS PREOCUPACIONES.

DE SU VOTO DEPENDE LA ELECCION DE REPUBLICANOS DE GRAN EXPERIENCIA Y QUE DE VERDAD COMPENDEN A NUESTRA COMUNIDAD.

¡NO PERMITA QUE OTROS LO REPRESENTEN! ¡HÁGASE OIR CON SU VOTO!

ANUNCIO POLITICO PAGADO POR SU PARTIDO REPUBLICANO DEL CONDADO DE DADE.

*MUCHAS
GRACIAS*

92040395094

RADIO COPY

AUGUST 24, 1989 - REPUBLICAN PARTY - JOB NO.

POLITICAL ANNOUNCEMENT - "ALBERTO CARDENAS" - SPANISH :30

(CARDENAS) *llama:*

TE HABLA ALBERTO CARDENAS. EL MARTES, 29 DE AGOSTO HAY ELECCIONES PARA EL CONGRESO FEDERAL, EL SENADO Y LA LEGISLATURA ESTATAL.

EN JUEGO ESTAN MAS QUE UNAS ELECCIONES. ~~TODOS SABEMOS EL AGRAVIO QUE HEMOS SUERIDO RECIENTEMENTE.~~ ~~NO DEBES SUER VOTO Y DEMUESTRA TU MADUREZ POLITICA~~ AHORA, MAS QUE NUNCA, ^{VOTA} DEBES VOTAR... PARA QUE NOS RESPETEN, SI NECESITAS TRANSPORTE, LLAMA AL 443-1676.

EL MARTES DAREMOS UN PASO ADELANTE/O HACIA ATRAS./ TODO DEPENDE DE TU VOTO.

VOTA POR TUS CANDIDATOS REPUBLICANOS. ~~MUCHAS GRACIAS.~~

ANNCR: ~~Anuncio Político Pagado por el Partido Republicano del Condado de Dade.~~

92040895095

Le habla María Alonso Martínez, Presidenta
del Partido Republicano.

EL MARTES, 29 DE AGOSTO ESTA EN JUEGO SU FUTURO Y EL DE
SU FAMILIA. ~~SI USTED VOTA~~ POR LOS CANDIDATOS REPUBLICANOS
~~PARA EL CONGRESO FEDERAL, EL SENADO Y LEGISLATURA~~
ESTATALES, ^{DARA ASEGURAR} ASEGURARA QUE SUS VALORES ~~Y NECESIDADES~~ ESTEN
BIEN REPRESENTADOS.

HAY QUIENES LUCHAN PARA QUE NO TENGAMOS PODER POLITICO.
NI DIGNA REPRESENTACION: LUCHE USTED POR NUESTRA COMUNIDAD
HACIENDOSE OIR CON SU VOTO EL MARTES.

~~VOTE POR SUS CANDIDATOS REPUBLICANOS. RECUERDE QUE~~
SU VOTO ES LA EXPRESION DE SU FE EN LA DEMOCRACIA.

~~VOTE PARA QUE NOS RESPETEN.~~ SI NECESITA ~~TRANSPORTE,~~ INFORMACION
LLAME AL 443-1676.

ANUNCIO POLITICO PAGADO POR SU PARTIDO REPUBLICANO DEL
CONDADO DE DADE.

92040895096

00C 7598



90 AUG 27 PM 12: 50

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
WASHINGTON, D.C. 20543

August 21, 1990

Federal Election Commission
Washington, D.C. 20463

ATT: JEFFREY LONG

CERTIFIED #P 256 376 666

RE: MUR 3054

Dear Mr. Long:

We are in receipt of the request which you faxed to us on August 20, 1990 to provide you with documentation relating to the \$948.70 expenditure from the Republican Party of Dade County in August, 1989.

We have enclosed the following:

1. A copy of our Invoice #103041-01 of 8/25/89 for 4,000 English Brochures.
2. A copy of the printed brochure.

If there is anything further you need, feel free to contact the undersigned.

Very truly yours,

DODD PRINTERS, INC.

Janet Guise
Janet Guise

JG/lr
Enc.

90 AUG 27 AM 11: 59

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK
WASHINGTON, D.C. 20543

9 2 0 4 0 8 9 5 0 7

Ros-Lehtinen Heama

401 Miracle Mile, Suite 107
Coral Gables, FL 33134
Phone: 443-1235

BULK RATE
U.S. POSTAGE
PAID
Permit #2022
Miami, Florida

2040895098

Ros-Lehtinen

PAID FOR BY
REPUBLICAN PARTY
OF DADE COUNTY



Send Our Most Experienced to Congress

Our Most Experienced
Ros-Lehtinen...

EDUCATOR

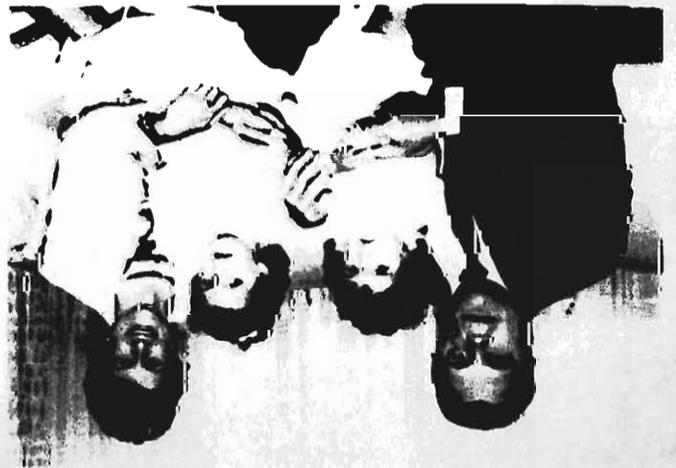
- Masters Degree in Educational Leadership
- Florida Certified Teacher

SENATOR

- Seven years in the Florida Legislature
- Passed Victims Bill of Rights, Prepaid College Tuition Program, School-area Drug Law, Drug-Free Workplace Act, and much more.

WIFE and MOTHER

- Married to Dexter Lehtinen
- Mother of two children, Amanda (3 years) and Patricia (1 1/2 years)



Ileana

Ros-Lehtinen

...OUR MOST EXPERIENCED

FOR THE FAMILY

Ileana Ros-Lehtinen recognizes that family values are central to our way of life. Ileana's legislative career has been committed to helping families help themselves. Her creation of the Florida Prepaid College Tuition Program to help families finance college costs is a good example of her leadership for family life. As a Congresswoman, she will fight to preserve and protect our families.



Ileana with her husband Dexter Lehtinen and their daughters, Amanda Michelle and Patricia Marie



Ileana and family raising the flag

FOR THE FLAG

Ileana Ros-Lehtinen believes that the American flag is the symbol of our freedom. On her first day in Congress, she will file legislation to protect the flag from burning or desecration. As a Florida legislator, she kept instruction about the dangers of communism in our public schools by saving the "Americanism vs. communism" course from repeal.



Ileana with President Reagan at the White House

FOR CONTROLLING TAXES

Ileana Ros-Lehtinen supports a balanced budget amendment and a line-item veto so that the nation does not constantly face rising taxes and budget deficits. As a Florida legislator, Ileana has consistently voted against continuing tax increases. She led the successful petition drive to repeal the occupational license tax which would have placed an unfair burden on small merchants.



President Bush greeting Ileana

92040895099

INVOICE



245 W. 75 PLACE • HIALEAH, FL 33014 • PHONE: (305) 557-1811

INVOICE NO. 103041-01

INVOICE DATE 08-25-89

SHIPPING DATE 08-26-89

FILE NUMBER

SOLD TO: 2100

ROS-LEHTINEN CAMPAIGN
REP. PARTY OF DADE COUNTY
2905 SALZEDO
CORAL GABLES, FL 33134

SHIP TO:

CUSTOMER PICK UP

03

C O D

4,000

3/1 ENGLISH BROCHURES
CHANGE DISCLAIMER TO "PAID FOR BY THE REPUBLICAN
PARTY OF DADE COUNTY"

880.00
15.00

SUBTOTAL
SALES TAX

895.00
52.70

8-28-89
CK #1011

In the event this invoice is not paid when due, the purchaser will pay all costs of collection including reasonable attorney's fees. All invoices will bear late charges at the rate of 1 1/2% per month if not paid in 30 days.

INVOICE TOTAL

948.70

0 0 1 S

EGC 7564

VIVA AMERICA

MEDIA GROUP

MIAMI • LOS ANGELES

MUR 3054

90 AUG 22 11:3:40

SL

90 AUG 22 PM 3:51

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF THE CLERK



VIVA CATALOG GROUP

VIVA MERCHANDISING GROUP

TO: Mr. JEFFREY LOU
FAX #: (305) 570-2480
PAGES: 4

DATE: 8/21/98

FROM: Mr. A. J. SULLIVAN
PHONE #: (305) 621-4227 ext. 103

COMMENTS: These are attached.
Thank you,
A.J. Sullivan

9204089101

LOS ANGELES
Studio / Office
1845 North Van St.
HOLLYWOOD, CA 90028
(213) 465-3171

MIAMI STUDIO
2980 Coral Way
Miami, FL 33145
(305) 445-4040

HEADQUARTERS
18501 N.W. 1st Court • Miami, Florida 33160 • Tel. (305) 630 5100 Ext 102 • FAX (305) 620-4559

Radio Miami
WAGI-710 AM

Florida Broadcasting Corporation INVOICE
P.O. BOX 481800 • 2980 CORAL WAY
MIAMI, FLORIDA 33148-1800
TEL: (305) 445-4040 • 445-4080 (SALES)

ADDRESS PAGE

SANCHEZ & LEVITAN
2100 CORAL WAY
SUITE 101
MIAMI

FL 33145

DATE	STATION/MARKET	REVENUE
08/31/89	WAGI-AM	POLIT
ACCOUNT NO.	AGENCY	REPRESENTATIVE
1665-5	68795	AUSUST
FOR BROADCAST INFORMATION CONTACT:		
ACCOUNTING DEPT 305/445-4040		
ADVERTISER	PRODUCT	
REPUBLICAN PARTY	REPUBLICAN PARTY	
SALES PERSON	SCHEDULE DATES	
LORETA ANAYA	FROM 07/31/89 TO 08/27/89	

TERMS	MAKE PAYMENT TO
DUE UPON RECEIPT	WAGI-AM 03

DATE	TIME	ETH	CLASS	MARKET	RATE	REMARKS
8/25	1207P	30	VAR		60.00	
8/25	0207P	30	VAR		60.00	
8/25	0406P	30	VAR		60.00	
8/25	0545P	30	VAR		60.00	
8/25	0637P	30	VAR		60.00	
8/25	0617P	30	VAR		60.00	
8/25	0828P	30	VAR		60.00	

DATE	TIME	ETH	CLASS	MARKET	RATE	REMARKS
8/25	0107P	30	VAR		60.00	
8/25	0306P	30	VAR		60.00	
8/25	0505P	30	VAR		60.00	
8/25	0603P	30	VAR		60.00	
8/25	0701P	30	VAR		60.00	
8/25	0721P	30	VAR		60.00	
8/25	0933A	30	VAR		60.00	

PAID
CHECK NO. 2010-20
ACCOUNT 1665-5
DATE 8/25/89
\$ 840.00

GROSS BILLING ANALYSIS				
CLASS	NO.	CONTRACT	UNIT COST	TOTAL COST
ANNCS	14	7730	60.00	840.00

TOTAL TIME CHARGES	\$	840.00
AGENCY COMMISSION	\$	126.00
OTHER CHARGES	\$	
AMOUNT DUE STATION	\$	714.00

SWORN TO AND SUBSCRIBED BEFORE ME
ON THIS DATE 08/31/89
AS WITNESS MY HAND AND NOTARY SEAL

FILE

92040895102

AM
 FM

SALES ORDER

NEW

ORDER # 1130
 CONTRACT # 1605-5
 CUSTOMER # 1605-5

REMOTE
 NEW REVISION ADDITION PRICE CHANGE CASH TRADE NON-CO.

DIRECT AGENCY POLITICAL
 DIRECTCOM NATIONAL PROGRAM

WEEKS 1 DAYS 5
 START DATE 8-25-89 END DATE 8-29-89

ADVERTISER REPUBLICAN PARTY

BILLING CYCLE: STANDARD WEEK
 SPECIAL / TRADE ALT.

PRODUCT POLITICAL ISSUE

AGENCY SANCHEZ LEONAN

RANK # _____

AGENCY EST # 795

CO-OP _____

ADDRESS 1800 SW 27 AVE MIAMI FL

PACKAGE _____ WEEKLY MONTHLY

CITY MIAMI STATE FL ZIP 33145

PHONE 305 441 1200 BUYER A. LEONAN

SALESPERSON L. ANAQUA # 6003



92040395103

LINE #	A R C	START DATE	END DATE	START TIME	END TIME	LEN	WK ROT	M	T	W	T	F	S	S	RATE	TOTAL WKLY #	TOTAL X	TOTAL \$
1		8-25-89	8-25-89	7PM	8P	10									60	10	1	600
2		8-26-89	8-27-89	6A	10A										60	4	1	240
3		8-28-89	8-28-89	6A	9P										60	13	1	780
4		8-28-89	8-28-89	6A	6P										60	13	1	780

ORDERED
 8/25

AS

BILLING NAME _____
 ADDRESS _____
 SPECIAL REMARKS _____
 CUSTOMER SIGNATURE _____

NOTES TO TRAFFIC & ACCT. _____

#SPOTS / WEEK	#SPOTS / ORDER
WEEKLY GROSS	TOTAL GROSS
SALES MOR.	
ORDERED BY <u>L. ANAQUA</u>	
DATE <u>8-24-89</u>	

Memphis Broadcasting Corporation
 P.O. BOX 461800 • 2800 CORAL WAY
 MIAMI, FLORIDA 33140-1800
 TEL: (305) 444-4040 • 445-4020 (SALES)

INVOICE

Radio Miami
WAGI-710 AM



PAGE

SANCHEZ & LEVITAN
 2100 CORAL WAY
 SUITE 101
 MIAMI

FL 33145

TERMS	MAKE PAYMENT TO
DUE UPON RECEIPT	WAGI-AM

DATE	STATION/MARKET	REVISED
09/30/89	WAGI-AM	
ACCOUNT NO.	AGENCY	REPRESENTATIVE
1605-5	00795	
FOR OFFICE INFORMATION CONTACT		
ACCOUNTING DEPT. 305/445-4000		
REPUBLICAN PARTY		REPUBLICAN PARTY
SALESPERSON		SCHEDULE DATES
LORETA ANAYA		FROM: 08/28/89 TO: 09/24/89

DATE	TIME	LEN	CLASS	M/S FOR	RATE	REMARKS
8/28	0752A	30	VAR		60.00	
8/28	0952A	30	VAR		60.00	
8/28	1155A	30	VAR		60.00	
8/28	0210P	30	VAR		60.00	
8/28	0411P	30	VAR		60.00	
8/28	0615P	30	VAR		60.00	
8/28	0849P	30	VAR		60.00	
8/29	0722A	30	VAR		60.00	
8/29	0929A	30	VAR		60.00	
8/29	1135A	30	VAR		60.00	
8/29	0137P	30	VAR		60.00	
8/29	0340P	30	VAR		60.00	
8/29	0510P	30	VAR		60.00	

DATE	TIME	LEN	CLASS	M/S FOR	RATE	REMARKS
8/28	0852A	30	VAR		60.00	
8/28	1055A	30	VAR		60.00	
8/28	1255P	30	VAR		60.00	
8/28	0310P	30	VAR		60.00	
8/28	0514P	30	VAR		60.00	
8/28	0822P	30	VAR		60.00	
8/29	0617A	30	VAR		60.00	
8/29	0828A	30	VAR		60.00	
8/29	1035A	30	VAR		60.00	
8/29	1236P	30	VAR		60.00	
8/29	0238P	30	VAR		60.00	
8/29	0442P	30	VAR		60.00	
8/29	0546P	30	VAR		60.00	

Handwritten note:
 9/28/89
 #1007

GROSS BILLING ANALYSIS				
CLASS	NO.	CONTRACT	UNIT COST	TOTAL COST
ANNCS	26	7730	60.00	1,560.00

TOTAL TIME CHARGES	1,560.00
AGENCY COMMISSION	234.00
OTHER CHARGES	
AMOUNT DUE STATION	1,326.00

SWORN TO AND SUBSCRIBED BEFORE ME
 ON THIS DATE 09/30/89
 AS WITNESS MY HAND AND NOTARY SEAL

FILE

92040895104

OGC 7720

WRHC
1550 kc

CADENA AZUL

90 SEP -3 AM 11:37

330 S.W. 27 AVE, MIAMI FL 33135
PHONE: (305) 643-1121 / 541-3300

August 23, 1990

Mr. George F. Rishel
Assistant General Counsel
Federal Election Commission
Washington, DC 20463

RE: MUR 3054

Dear Mr. Rishel:

The following is to inform that the administration in WRHC Cadena Azul has changed, the new General Manager is Jorge A. Rodriguez. In any event the correspondence of July 19, 1990, to which you refer in the letter of August 13, 1990 was never received. Further, your August 13 letter mentions that a copy of a document is enclosed. No such document was enclosed.

Please be so kind as to send it at your convenience.

Very truly yours,


Jorge A. Rodriguez
General Manager

JAR: dp
1JARDF2

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RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 AUG 30 AM 10:03
RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 SEP -5 AM 10:07

06C7954

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

90 SEP 24 AM 9:49



HOUSE OF REPRESENTATIVES

P.O. Box 52-2784
Miami, FL 33152-2784
(305) 477-7988
Fax: 477-6732

ILEANA ROS-LEHTINEN

September 21, 1990

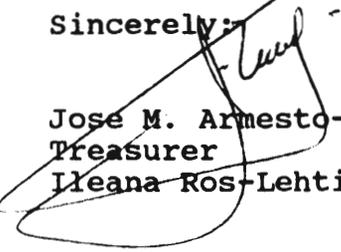
Mr. Lawrence Noble
Office of General Counsel
Federal Elections Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 3054

Dear Mr. Noble:

With regard to your letter of July 31, 1990, the Ileana Ros-Lehtinen for Congress Committee ("the Committee") views the transfers from the Special Congressional Election Fund as contributions for the primary election. These transfers represented monies received by the Special Congressional Election Fund prior to the date of the primary.

Sincerely:


Jose M. Armesto-Martinez
Treasurer
Ileana Ros-Lehtinen for Congress

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM
90 SEP 24 PM 2:52

92040395106

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Ileana Ros-Lehtinen for Congress)
 Committee and Jose J.)
 Martinez-Armesto, as treasurer)
)
 Republican National Committee)
 and William J. McManus, as)
 treasurer)
)
 National Republican Congressional)
 Committee and Nancy S. Marshall,)
 as assistant treasurer¹)
)
 Republican Party of Florida and)
 Shirlee Bowne, as treasurer)
)
 Republican Party of Dade County)
 and David W. Southwell, as)
 treasurer)

MUR 3054

90 OCT 25 PM 3:35

RECEIVED
FEDERAL ELECTION COMMISSION

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GENERAL COUNSEL'S REPORT

I. BACKGROUND

On April 19, 1990, the Commission found reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer² ("the Ros-Lehtinen Committee") violated 2 U.S.C. §§ 433(c), 434(a)(6), and 441a(f). These findings related to its failure to amend its Statement of Organization to show a new treasurer after

1. Subsequent to the findings in this matter, this Office learned that Jack McDonald had resigned as treasurer and that the committee was in the process of selecting a new treasurer. Notification of this had been submitted to the Commission on August 23, 1989, but had not resulted in any change to the "B" Index, where Mr. McDonald continues to be listed as treasurer. Nevertheless, in accordance with Commission policy, Nancy S. Marshall, as assistant treasurer, is substituted in this matter for Jack McDonald.

2. Subsequent to the findings but before the notification letters were sent, this Office learned that the Committee had named Jose M. Martinez-Armesto as its new treasurer. Therefore, his name was substituted in the notification letter.

the resignation of the previous treasurer, the failure to file certain 48-hour reports, and the receipt of excessive contributions from certain individuals and party committees. The Ros-Lehtinen Committee filed responses on June 1, July 5, and July 26. The Committee has not requested preprobable cause conciliation. Attachment 1.

On April 19, 1990, the Commission also found reason to believe the Republican National Committee ("RNC"), the National Republican Congressional Committee ("NRCC"), the Republican Party of Florida ("Florida"), and the Republican Party of Dade County ("Dade County") had each violated 2 U.S.C. §§ 434(b) and 441a. These findings related to the making of excessive contributions by these committees to the Ros-Lehtinen Committee and the failure to report the proper election designations for their contributions. The NRCC and Florida filed responses on May 14, 1990; Dade County on May 16; and the RNC on June 8. None of these committees requested preprobable cause conciliation. Attachment 2, 3, 4, and 5. The RNC, however, requested that no further action be taken against it in this matter. Attachment 5.

The investigation in this matter also included the question whether expenditures made by Dade County in connection with the August 1989 special elections qualified as exempt payments or were properly reported as coordinated party expenditures. This Office noted in CIR #1 that the treasurer of Dade County had simply stated that the subject expenditures were made without his knowledge and consent and that we should address our questions to other individuals. The treasurer of Dade County had filed a

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complaint with the Commission, designated MUR 3003, making similar allegations regarding these expenditures. On June 7, 1990, the Commission found no reason to believe the three named respondents violated 11 C.F.R. § 102.7(c) and closed the file in MUR 3003. Therefore, this Office sent letters to the vendors requesting copies of the scripts and printed materials. Responses to these letters were received on August 21, 22, and 27. Attachment 6.

II. ANALYSIS

The issues covered in this report include (1) the alleged making and receipt of excessive contributions; (2) the notification of a new treasurer; (3) the failure to file 48-hour reports; and (4) the Dade County expenditures as exempt payments or coordinated party expenditures.

A. Alleged Excessive Contributions

The question of the alleged excessive contributions by the RNC and NRCC turn on the questions whether the contributions to the Special Congressional Election Fund are attributable to the primary election limitations. The question of the alleged excessive contributions by Florida turn on whether the Ros-Lehtinen Committee had net debts outstanding from the primary. The question regarding Dade County relates to whether Florida and Dade County are affiliated committees for purposes of the Act's limitations. The individual excessive contributions do not present any special issues.

1. Special Congressional Election Fund

The Special Congressional Election Fund ("the Fund")

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registered with the Commission on July 14, 1989, as a nonconnected committee pursuant to Advisory Opinion 1977-16. Alberto R. Cardenas was listed as its treasurer and custodian of records. Mr. Cardenas is a state and executive committeeman of the Republican Party of Dade County.³ In a letter accompanying the Statement of Organization, Mr. Cardenas stated that the Fund would operate "as if it is an 'authorized committee'" pursuant to the advisory opinion. He further stated that "[o]nce the selected candidate retroactively designates the Congressional Election Fund as his principal campaign committee, we will file the required amended Statement of Organization and Statement of Candidacy appropriately designating the Committee." The amended Statement of Organization and the amended Statement of Candidacy for Ileana Ros-Lehtinen were filed on August 25, 1989, designating the Special Congressional Election Fund as an authorized committee of Ms. Ros-Lehtinen.

The Fund filed one report (as a termination report) on November 20, 1989, covering the period from July 14 through November 18, 1989. The report was signed by Richard Preston Tonkinson, then treasurer of the Ros-Lehtinen Committee. It disclosed total receipts and disbursements of \$22,600. It reported all of its receipts with the same date: August 8, 1989. The box for the general election was checked for all contributions. It reported disbursements of \$19,000 on August 7, 1989, and \$3,600 on August 16, 1989, to the Ros-Lehtinen

3. He was also one of the individuals named in the complaint in MUR 3003 filed by the treasurer of the Dade County party.

Committee. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989.

The National Republican Congressional Committee ("NRCC") reported making a \$5,000 contribution to the Fund on July 25, 1989, and identified it as designated for the special primary. The NRCC also reported making \$5,000 in contributions on August 3 to the Ros-Lehtinen Committee as designated for the special general. The NRCC provided copies of its contribution checks to the Fund and the Ros-Lehtinen Committee. The check statement for the contribution to the Fund is clearly marked "Special Primary Election Contribution." The check was issued July 25, 1989, prior to the August 1 primary, but the NRCC states that it has "no correspondence indicating the date this contribution was delivered to the Committee, mailed, or postmarked."

It did, however, provide a copy of a letter from D. Stephen Edwards, chief legal counsel for the NRCC, dated March 21, 1990, in response to a letter from the Ros-Lehtinen Committee requesting redesignation of the contribution. Mr. Edwards points out that the NRCC reported the contribution as a primary election one because it was made before the August 1 primary. He cites to the Commission regulation that states that a contribution is deemed made on the date the contributor relinquishes control over it. He then notes that the NRCC "relinquished control prior to August 1st." He then suggests that it is the Ros-Lehtinen Committee's reports that should be amended and that there is no need for the NRCC to redesignate the contribution. The NRCC also states that at the time it made this contribution it was aware

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the Fund would be made an authorized committee by the eventual nominee and was operating as if it were a principal campaign committee pursuant to Advisory Opinion 1977-16.

Thus, the NRCC is relying on the regulatory provision that a contribution designated for the primary and made prior to it is for that election. It also appears to be taking the position that a contribution to the Fund is the same as if made to the eventual nominee and that contributions to the Fund prior to the primary are chargeable to the primary election limitation. As such, the NRCC asserts that it made a \$5,000 contribution with respect to the primary election and a \$5,000 contribution with respect to the general election, which are within the Act's limitations.

The Republican National Committee reported making a contribution to the Fund on July 20, 1989, but did not identify it as made with respect to any particular election. It also initially reported making a \$5,000 contribution to the Ros-Lehtinen Committee on August 3, 1989, as designated for the primary election. In response to an RFAI, Jay C. Benning, assistant treasurer and director of administration for the RNC, explained in a letter dated March 13, 1990, that it made a \$5,000 contribution on July 20, 1989, to the Fund, which later became an authorized committee for Ms. Ros-Lehtinen. The letter further noted that the August 3, 1989, \$5,000 contribution to the Ros-Lehtinen Committee "was intended for primary debt" and was reported as such. It then noted that the "RNC thus made a \$5,000 contribution allocable to the primary, and a \$5,000 contribution

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allocable to the general election." Thus, this letter made it appear the contribution to the Fund was for the general election.

In its responses the RNC provided copies of the contribution checks to the Fund and the Ros-Lehtinen Committee. The checks and check statements contain no election designations. The check to the Fund was issued July 20, 1989, and the check to the Ros-Lehtinen Committee was issued August 3, 1989. The RNC states that the July 20 check to the Fund was delivered "by overnight courier." Thus, it was made prior to the primary. A copy of the letter from Lee Atwater to the Ros-Lehtinen Committee dated August 4, 1989, does not indicate an election designation for the August 3 contribution. As noted, the RNC initially reported the contribution to the Fund without any election designation and the contribution to the Ros-Lehtinen Committee with a primary election designation. In a subsequent response in this matter, the RNC filed an amendment to its September 1989 report in which it redesignated the August 3 contribution to the Ros-Lehtinen Committee as made for the general election. It noted that the March 13 letter was not intended to be an amendment to its reports.

The RNC maintains that because the Fund intended to function as an authorized committee of the eventual nominee, contributions to it prior to the primary should be treated as if made to the eventual candidate prior to the primary and chargeable to the primary election limitations. It relies on Advisory Opinion 1977-16 for support. It posits that the advisory opinion did not place any requirement that contributions to such a candidate

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search committee be chargeable to the general election rather than the primary election simply because the funds would go to the eventual nominee.⁴

The RNC then relies on the regulatory presumption that an undesignated contribution made prior to an election is chargeable to that election's limitations. Its position is that the July 20 contribution to the Fund is chargeable to the primary election limitation and the August 3 contribution to the Ros-Lehtinen Committee is chargeable to the general election in that both were undesignated and made prior to those elections. Thus, it maintains that it made a \$5,000 contribution with respect to the primary election and a \$5,000 contribution with respect to the general election, which are within the Act's limitations.

4. Advisory Opinion 1977-16 addressed the situation where a committee initially intended to function as a search committee to select the best Republican nominee for the 1980 Senate election in Iowa. It anticipated a candidate would be selected in 1979 and would then designate the committee as the candidate's principal campaign committee. It intended to accept contributions only within the limits applicable to a principal campaign committee and to have its organization and contributions go to the candidate on his or her selection. The committee also intended to aggregate contributions to it with any other contributions to the selected candidate for limitation purposes. The Commission concluded that this activity was permissible under the Act and noted that "all previous payments received and made are retroactively regarded as contributions accepted and expenditures made by the Committee as principal campaign committee of the selected candidate." (emphasis in the original). Although the factual circumstances presented in the advisory opinion indicated that the selection of a candidate and the designation of the committee as a principal campaign committee would occur prior to the Iowa primary, the opinion made no statement regarding to which election the contributions to the search committee would be attributable. The regulations at that time also provided that undesignated contributions made prior to an election are attributable to that election. 11 C.F.R. § 110.1(a)(2)(1977).

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In the First General Counsel's Report, we noted that because it appeared the Fund was set up to raise contributions for the eventual nominee, it appeared more appropriate to treat contributions to the Fund as made with respect to the general election. Thus, at that time we did not view the dates of the contributions to the Funds as by themselves determinative. The RNC did originally report the undesignated August 3 contribution to the Ros-Lehtinen Committee as made with respect to the primary and in the March 13 letter indicated the undesignated contribution to the Fund was made with respect to the general election. The RNC has since amended its reports to show the August 3 contribution as made for the general election and maintains the contribution to the Fund was for the primary election. While we continue to see merit in our original position, we do acknowledge that the NRCC and RNC positions also have merit in that they rely on the regulatory provisions relating to the designation and attribution of contributions with respect to particular elections. We further acknowledge that the advisory opinion did not address this issue. The NRCC and RNC contributions do not exceed the maximum that they could legally contribute to Ileana Ros-Lehtinen's candidacy. The RNC, however, initially misreported the August 3, 1989, contribution as for the primary election when in fact it was undesignated and made after the primary and before the general election. It amended its report to show it as a general election contribution after the initiation of this matter.

Accordingly, we recommend that the Commission take no further

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action with respect to the NRCC and the Ros-Lehtinen Committee with respect to these contributions and close the file as it pertains to the NRCC. We further recommend that the Commission take no further action with respect to the RNC regarding the Section 441a(a) finding. This Office will prepare a brief for the RNC on the Section 434(b) finding.

2. Net Debts Outstanding

The Republican Party of Florida ("Florida") reported making a \$4,500 contribution to the Ros-Lehtinen Committee on August 7, 1989, for the general election and a \$5,000 contribution on August 9, 1989, for the primary election. The Ros-Lehtinen Committee reported the receipt of these contributions on August 9 and August 11 and indicated they were both for the general election. We noted in the First General Counsel's Report that the reports filed by the Ros-Lehtinen Committee did not indicate it had net debts outstanding at the time these contributions were made. The report covering the period ending July 26, 1989, disclosed debts owed of \$20,000 and cash on hand of \$66,626. The report for the period ending August 9, 1989, disclosed no debts owed and cash on hand of \$54,706. Therefore, it appeared Florida had made an excessive general election contribution.

In its response, Florida provided a copy of the two contribution checks. The \$4,500 check issued on August 7 clearly indicates "general election" on the check statement portion. The \$5,000 check issued August 9 contains no election designation on the check or check statement. Florida did provide, however, a copy of an August 5 letter from the treasurer of the Ros-Lehtinen

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Committee to Florida requesting "a \$5,000 contribution to help fund our Primary Debt" and an August 9 letter from Florida to the Committee enclosing the \$5,000 check "per your recent request." This correspondence appears sufficient to treat the August 9 \$5,000 contribution as designated for the primary election.

Thus, the question regarding whether this contribution was excessive turns on whether the Ros-Lehtinen Committee had net debts outstanding from the primary election at the time it solicited and received this contribution. In its initial response, the Ros-Lehtinen Committee simply stated that "there was in fact a campaign debt as of the close of business on August 1, 1989, the date of the special primary." On July 5, 1990, the Committee filed amended reports with respect to its 1989 activities. The amended report covering the period ending July 14, 1989, disclosed no debts owed by the Committee and cash on hand of \$65,615.70. The amended report covering the period ending July 26, 1989, disclosed \$20,000 in debts owed and cash on hand of \$65,638.31. The amended report covering the period ending August 9 disclosed debts owed of \$22,919.40 and a negative cash on hand of \$2,757.21. At this point the Committee had reported raising a total of \$482,631.27 and disbursing a total of \$504,388.48. The amended report covering the period ending September 18 disclosed debts owed of \$13,756.66 and cash on hand of \$22,453.80.

To further clarify this question, this Office sent follow up questions to the Committee. The treasurer responded on July 26, 1990. Attachment 1, pages 8-10. The treasurer notes that as of

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August 1, 1989, the date of the special primary election, the Ros-Lehtinen Committee had overall cash on hand of \$76,598.59 of which the total amount of funds received for the primary was \$67,448.59.⁵ He then states that the Committee had total primary debts of \$78,041.34 outstanding as of the primary election. He provided an itemized list of these debts together with copies of the invoices and payment checks. This Office has examined these documents and determined that by August 9, 1989, when Florida made its \$5,000 contribution for the primary election, the Committee had paid \$42,897.82 in primary debts. Thus, it appears that these payments reduced its remaining outstanding debts to \$35,143.52 (from \$78,041.34) and reduced the amount of primary funds available to pay those debts to \$24,550.77 (from \$67,448.59). Thus, it would appear that at the time Florida made its \$5,000 contribution, the Ros-Lehtinen Committee had \$10,592.75 in net debts outstanding from the primary election. A review of the Committee's report for the period from July 27 to August 9 discloses \$4,975 in contributions that are designated for the primary and were received after the primary or for which no date of receipt is listed. Taking into account these contributions, the Committee would still appear to have had \$5,617.75 in net debts outstanding when Florida made its

5. We interpret this statement to mean that the difference consisted of funds received prior to the primary that were designated for the special general election. The Explanation and Justification for the regulations at 11 C.F.R. § 110.1(b)(3)(ii) specifically provides for the exclusion of such designated contributions from the cash on hand calculation. See 52 Fed. Reg. 762 (1987).

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contribution.⁶

Therefore, it appears that Florida could legally make, and the Committee could legally accept, this contribution. Therefore, we recommend that the Commission take no further action against Florida and the Ros-Lehtinen Committee with respect to this contribution. As noted, however, the Ros-Lehtinen Committee amended its report covering the period ending August 9 to disclosed \$22,919.40 in debts not previously disclosed. This amendment was filed in July 1990 after the initiation of this matter. Therefore, we recommend that the Commission find reason to believe the Ileana Ros-Lehtinen for Congress Committee and Jose J. Martinez-Armesto, as treasurer, violated 2 U.S.C. § 434(b) with regard to its failure to fully and timely report its debts.

3. Presumption of Affiliation

The First General Counsel's Report also noted that the Republican Party of Dade County reported making a contribution to the Ros-Lehtinen Committee on August 11, 1989. The report noted the regulation that creates a presumption of affiliation between a state party committee and subordinate state party committees. See 11 C.F.R. § 110.3(b)(3) (formerly § 110.3(b)(2)(ii)). The report further noted that the presumption was rebuttable, but at that point there was no evidence to resolve this issue. Thus, the Commission made reason to believe findings against both Florida and Dade County with respect to this contribution.

6. A more detailed audit analysis would be necessary to verify this conclusion.

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Commission regulations provide that all contributions made by political committees established, financed, maintained, or controlled by a state party committee and by subordinate party committees shall be considered to have been made by one committee for purposes of the Act's limitations. This presumption does not apply if (1) the political committee of the party unit in question has not received funds from any other political committee established, financed, maintained, or controlled by any party unit and (2) the political committee of the party unit in question does not make its contributions in cooperation, consultation or concert with, or at the request or suggestion of any other party unit.

In its response, the treasurer of Florida states under oath that to her knowledge "the Republican Party of Florida Federal Campaign Committee has not requested or suggested to the Republican Party of Dade County that it made specific contributions to federal, state or local candidates, nor has the Republican Party of Florida worked in concert or cooperation with the Republican Party of Dade County in making of any contributions to federal, state or local candidates." She further avers that "the Republican Party of Florida does not recognize the Republican Party of Dade County as an affiliated organization." Florida and Dade County have not listed each other as affiliated committees on their respective Statements of Organization.

Despite these factors, the treasurer further acknowledges in her sworn response that although Florida's federal account made

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no transfers to Dade County in 1987, 1988, or 1989, the nonfederal account issued these checks to the nonfederal account of Dade County in these years:

Date	Amount
2/13/87	\$10.00
2/13/87	10.00
3/16/88	10.00
6/21/88	1,000.00
9/26/88	817.20
5/1/89	50.00
6/20/89	1,000.00

As previously noted, Dade County did not address this issue or respond to the interrogatories on this issue. Because it appears that Dade County has received some transfers from Florida, although apparently limited to their respective nonfederal accounts, it does not appear that the presumption of affiliation has been adequately rebutted.

In the previous subsection, we noted that it appeared the two contributions from Florida to the Ros-Lehtinen Committee were within the Act's limitations. The \$5,000 contribution from Dade County with respect to the general election (August 11) was made after the \$4,500 general election contribution from Florida (August 7).⁷ Thus, Dade County made an excessive contribution of \$4,500. The excessive contribution by Dade County will be addressed in the probable cause briefs to Dade County and the Ros-Lehtinen Committee. For these reasons, we recommend that the

7. The Ros-Lehtinen Committee states in its response that the Dade County contribution was delivered by messenger on August 11. Florida issued and reported its general election contribution as made on August 7. The Ros-Lehtinen Committee reported its receipt on August 9.

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Commission take no further action against Florida with respect to this contribution.

4. Individual Excessive Contributions

This matter also involves the Ros-Lehtinen Committee's acceptance of \$2,800 in excessive contributions from four individuals: Frederick W. Guardabassi (\$500); Robin Kaskal (\$1,000); Alma E. Morissette (\$1,000); and Fernando Rodriguez (\$300).

The excessive contribution from Robin Kaskal was based on the Ros-Lehtinen Committee's reports that disclosed a \$1,000 contribution from her on August 25, 1989, and another \$1,000 contribution on August 30, 1989, identified as "food" and apparently intended to be reported as an in-kind contribution in that it was also reported as a disbursement. In its response the Ros-Lehtinen Committee provided a copy of a letter signed by William and Robin Kaskal that states that the only contribution they made to the Ros-Lehtinen Committee was a \$2,000 check dated August 25, 1989, to be divided equally between the two of them. The Committee also produced a copy of an attribution letter dated August 30, 1989. The letter further states that this check is the only contribution they made to the Committee. They state that "there was no in-kind donation of any type or amount made by either of us at any time during the campaign." The Ros-Lehtinen Committee filed an amended report with its response that deleted the \$1,000 "food" contribution from Robin Kaskal. Therefore, it appears that she did not make an excessive contribution.

With regard to the other individuals, the Ros-Lehtinen

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Committee reported making refunds to these contributors of the excessive portion of their contributions on May 31, 1990. Attachment 7. Although these refunds mitigate the violation, they were not made within the regulatory time frame to negate the receipt of the excessives.

Therefore, we recommend that the Commission take no further action with respect to the Ros-Lehtinen Committee regarding the alleged contributions from Robin Kaskal. This Office will address the excessive contributions from the other three individuals in a probable cause brief to the Ros-Lehtinen Committee.

B. Treasurer Notification

The Act provides that every committee shall have a treasurer and that no contribution or expenditures shall be accepted or made by the committee during any period when the office of treasurer is vacant. 2 U.S.C. § 432(a). The Act further provides that each Statement of Organization shall identify the treasurer. 2 U.S.C. § 433(b). Furthermore, the Act requires that all changes in information previously submitted on a Statement of Organization shall be reported to the Commission within 10 days of the change.

The First General Counsel's Report noted that the former treasurer of the Ros-Lehtinen Committee, Richard Preston Tonkinson, had sent a letter dated January 24, 1990, informing the Commission that he had resigned effective December 31, 1989. That report noted that Rep. Ros-Lehtinen had signed the 1989 Year End Report as treasurer. On March 29, 1990, the Ros-Lehtinen

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Committee filed an amended Statement of Organization naming Jose M. Martinez-Armesto as the new treasurer, effective March 19, 1990. In its response, the Ros-Lehtinen Committee states that between December 31, 1989, and April 2, 1990, the Committee received no contributions and made no expenditures.⁸ A review of the Ros-Lehtinen Committee's 1990 Mid-Year Report confirms this statement. It shows only the receipt of certain interest payments during the period when the treasurer position was officially vacant.

Nevertheless, the Ros-Lehtinen Committee did not report the resignation of the treasurer within 10 days of such change. Therefore, there is still a violation of 2 U.S.C. § 433(c), which will be included in the brief.

C. 48-Hour Reports

The Commission found reason to believe the Committee had violated 2 U.S.C. § 434(a)(6) by failing to file required 48-hour reports on five occasions prior to the special general election covering \$29,000 in contributions of \$1,000 or more received in the applicable time period.

The Committee has not responded to, or contested, this finding. No investigation is required. Therefore, it will be included in the brief with a recommendation to find probable cause to believe on 2 U.S.C. § 434(a)(6).

8. As noted in the First General Counsel's Report, Rep. Ros-Lehtinen established a new principal campaign committee for the 1990 elections.

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D. Exempt and Coordinated Expenditures

In the First General Counsel's Report, we raised questions regarding the reported coordinated party expenditures on behalf of Ileana Ros-Lehtinen by the NRCC and Dade County and the reporting and financing of certain exempt payments by Dade County.

The coordinated party expenditure limitation with respect to the 1989 special general election was \$23,990 each for the Republican Party of Florida and the RNC. The responses by Florida, the RNC, and the NRCC provide copies of the letters by which both Florida and the RNC authorized the NRCC to serve as their agent for the purpose of making these expenditures. The NRCC reported making \$47,836 in coordinated party expenditures on behalf of Ileana Ros-Lehtinen.

Dade County also reported making coordinated party expenditures on behalf of Ms. Ros-Lehtinen in the amount of \$4,747.74. These expenditures were to Dodd Printers of Hialeah in two payments on August 25, 1989, of \$3,799.04 and \$948.70, for campaign material. Dade County also reported \$8,800 in payments to Sanchez & Levitan Advertising Co. on August 25, 1989, and three radio stations on August 24, 1989, for a GOTV radio campaign. In response to an inquiry from RAD, the treasurer of Dade County had stated that these expenditures had been made pursuant to authorization by the RNC and that Dade County had received \$7,000 for that purpose. He said the GOTV radio ads were not specific to any candidate. He also claimed Dade County had authorization from the RNC to made coordinated party

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expenditures. In response to the findings in this matter, the treasurer claimed that these expenditures were made without his knowledge or consent and referred to his complaint in MUR 3003.

The RNC stated in an affidavit by its treasurer that it "had no record of any authorization to the Republican Party of Dade County to make §441a(d) expenditures." He noted that Dade County could make party building expenditures on behalf of all candidates on the special ballot. The treasurer added that the \$7,000 transfer to Dade County was for the purpose of paying for "party building expenses relating to a Republican get-out-the-vote radio campaign." He provided documentation to support this statement. The wire transfer occurred on August 24, 1989. Attachment 5, pages 62, 63.

Sanchez & Levitan provided copies of the scripts used for the radio ads, which were in Spanish. A translation by staff of this Office shows that the ads consisted primarily of a message from party or elected officials urging listeners to vote for the Republican candidates for the state legislature and for Congress in the special election of August 29. The principal passage read:

Secure the election of Republican candidates to the Federal Congress as well as the senate and state legislature. They represent your values and your concerns.

...

On Tuesday, August 29th, your future and that of your family is at hand. Vote for the Republican candidates, in order to secure that your values are well represented.

...

(This is) Alberto Cardenas speaking to you. On Tuesday, August 29th, there are elections for the Federal Congress, the senate, and the state legislature. ... Vote for your Republican candidates.

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These scripts show that the ads made a clearly identified reference to Ileana Ros-Lehtinen, a federal candidate. Because this was a special election and she was the only Republican candidate for Congress in that election, there is no doubt as to who the ads referred to. Attachment 6. Thus, an allocated portion of these payments should have been reported as in-kind contributions to Ileana Ros-Lehtinen.⁹ This issue will be included in the brief to Dade County as part of its overall excessive contributions to this candidate.

As noted, Dade County reported other payments as coordinated party expenditures pursuant to 2 U.S.C. § 441a(d). Neither Florida nor the RNC authorized Dade County to make such payments, and Dade County had no limit of its own by which it could make such payments. The payments to Dodd Printers were for a campaign brochure, bumper stickers, and fans which clearly identified Ileana Ros-Lehtinen. Attachment 6.¹⁰ For the period from July 1 to September 18, 1989, Dade County reported no payments for postage, mailings, or mailing lists or to any vendors other than Dodd Printers, Sanchez & Levitan, and the radio stations. See First General Counsel's Report, dated April 16, 1990, Attachment 2, pages 19-26.

9. Because there were apparently three contests on the ballot for the August special election, the costs of these radio ads should have been apportioned one third to Ros-Lehtinen and two-thirds to the local candidates. 11 C.F.R. § 106.1(a).

10. The written response from Dodd Printers only relates to the brochure. In a follow up telephone call on September 4, 1990, Janet Guise from Dodd Printers stated that the \$3,799.04 payment was for bumper stickers and fans.

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The Act and regulations specifically permit a local party committee to make such payments in connection with volunteer activity (and subject to certain other requirements) without the payments being considered a contribution or expenditure under the Act. 2 U.S.C. §§ 431(8)(b)(x) and 431(9)(b)(viii). Because Dade County reported no postage costs, it appears that these payments would qualify for this exemption.¹¹ Nevertheless, the evidence indicates that Dade County has misreported these payments as coordinated party expenditures rather than as operating expenditures.

Accordingly, the brief to Dade County will recommend probable cause on 2 U.S.C. § 434(b) for the misreporting of these expenditures in addition to the probable cause recommendation of 2 U.S.C. § 441a for making excessive contributions to the Ros-Lehtinen Committee.

III. RECOMMENDATIONS

1. Take no further action with respect to the National Republican Congressional Committee and Nancy S. Marshall, as assistant treasurer; and the Republican Party of Florida and Shirlee Bowne, as treasurer, with respect to 2 U.S.C. §§ 434(b) and 441a and close the file as to these respondents.
2. Take no further action with respect to the Ileana Ros-Lehtinen for Congress Committee and Jose J. Martinez-Armesto, as treasurer, regarding the contributions from the Republican National Committee, the National Republican Congressional Committee, the Republican Party of Florida, and Robin Kaskal.
3. Take no further action with respect to the

11. The \$7,000 transfer from the RNC was designated for the radio ads and was used for that purpose. The reports filed by Dade County indicate that at the time of the payment to Dodd Printing, Dade County had sufficient funds on hand from sources other than the RNC to make the payments.

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Republican National Committee and William J. McManus, as treasurer, regarding 2 U.S.C. § 441a.

4. Find reason to believe the Ileana Ros-Lehtinen for Congress Committee and Jose J. Martinez-Armesto, as treasurer, violated 2 U.S.C. § 434(b).

5. Approve the attached factual and legal analysis and the appropriate letters.

Lawrence M. Noble
General Counsel

10/24/90
Date


BY: Lois G. Lerner
Associate General Counsel

Attachments

1. Ros-Lehtinen Committee responses (exhibits not included)
2. NRCC Response
3. Florida Response
4. Dade County Response
5. RNC Responses
6. Vendor Responses
7. Report Excerpts
8. Factual and Legal Analysis

Staff assigned: George F. Rishel
Jeffrey D. Long

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FEDERAL ELECTION COMMISSION
WASHINGTON DC 20461

MEMORANDUM

TO: LAWRENCE M. NOBLE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/DELORES HARRIS *DH*
COMMISSION SECRETARY

DATE: OCTOBER 30, 1990

SUBJECT: MUR 3054 - GENERAL COUNSEL'S REPORT
DATED OCTOBER 24, 1990.

The above-captioned document was circulated to the Commission on FRIDAY, OCTOBER 26, 1990 at 12:00 p.m.

Objection(s) have been received from the Commissioner(s) as indicated by the name(s) checked below:

Commissioner Aikens	<u>XXX</u>
Commissioner Elliott	<u>XXX</u>
Commissioner Josefiak	<u>XXX</u>
Commissioner McDonald	<u> </u>
Commissioner McGarry	<u>XXX</u>
Commissioner Thomas	<u> </u>

This matter will be placed on the meeting agenda for TUESDAY, NOVEMBER 14, 1990.

Please notify us who will represent your Division before the Commission on this matter.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Ileana Ros-Lehtinen for Congress)
 Committee and Jose J. Martinez-)
 Armesto, as treasurer; Republican)
 National Committee and William J.)
 McManus, as treasurer; National) MUR 3054
 Republican Congressional Committee)
 and Nancy S. Marshall, as assistant)
 treasurer; Republican Party of)
 Florida and Shirlee Bowne, as)
 treasurer; Republican Party of Dade)
 County and David W. Southwell, as)
 treasurer.)

CORRECTED CERTIFICATION

I, Hilda Arnold, recording secretary for the
 Federal Election Commission executive session of November 14,
 1990, do hereby certify that the Commission decided by a vote
 of 6-0 to take the following actions in MUR 3054:

1. Take no further action with respect to the National Republican Congressional Committee and Nancy S. Marshall, as assistant treasurer; and the Republican Party of Florida and Shirlee Bowne, as treasurer, with respect to 2 U.S.C. §§ 434(b) and 441a and close the file as to these respondents.

(continued)

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2. Take no further action with respect to the Ileana Ros-Lehtinen for Congress Committee and Jose J. Martinez-Armesto, as treasurer, regarding the contributions from the Republican National Committee, the National Republican Congressional Committee, the Republican Party of Florida, and Robin Kaskal.
3. Take no further action with respect to the Republican National Committee and William J. McManus, as treasurer, regarding 2 U.S.C. § 441a.
4. Find reason to believe the Ileana Ros-Lehtinen for Congress Committee and Jose J. Martinez-Armesto, as treasurer, violated 2 U.S.C. § 434(b), but take no further action.

(continued)

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5. Take no further action on everything else except the 48-hour notification problem by the Ros-Lehtinen Committee, receipt by the Ros-Lehtinen Committee of three individual excessive contributions, the Dade County affiliation and reporting issues, and the radio ad.

6. Approve the factual and legal analysis and the appropriate letters as recommended in the General Counsel's report dated October 24, 1990.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry and Thomas voted affirmatively for the decision.

Attest:

11/19/90
Date

Hilda Arnold
Hilda Arnold
Administrative Assistant

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ES



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HOUSE OF REPRESENTATIVES

2227 Coral Way
Miami, FL 33145-3508
(305) 859-8414
Fax: (305) 859-8984

ILEANA ROS-LEHTINEN

November 13, 1990

Mr. Lawrence Noble
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: MUR 3054

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
90 NOV 20 AM 11: 44

Dear Mr. Noble:

Please be advised that the Ileana Ros-Lehtinen for Congress Committee has issued a \$5,000 refund to the Republican Party of Florida. This refund represents a return of a contribution received from the Republican Party of Florida in August 1989 for the purpose of assisting in the retirement of the primary debt from the special primary election on August 1, 1990.

A copy of the refund check is enclosed.

Sincerely,


Jose M. Martinez-Armesto
Treasurer
Ileana Ros-Lehtinen for Congress

cc: Mr. Van B. Poole, Chairman
Republican Party of Florida
P.O. Box 311
Tallahassee, FL 32302
encl.

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ILEANA ROS-LEHTINEN FOR
CONGRESS 1990
8421-B NW 56TH ST.
MIAMI, FL 33166

1427

63-60 602/660

11/13/90

PAY TO THE
ORDER OF

Republican Party of Florida \$ 5000.00
Five thousand and ⁰⁰/₁₀₀'s DOLLARS



SunBank/Miami, N.A. 602
Palmato Office
7506 N.W. 56th Street
Miami, FL 33166

FOR

Debra L. Musgrove

⑆066000604⑆0602006008935⑆ 1427

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 30, 1990

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2874
Miami, FL 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as
treasurer

Dear Mr. Martinez-Armesto:

On April 26, 1990, you were notified that the Federal Election Commission found reason to believe that the Ileana Ros-Lehtinen for Congress committee ("Committee") and you, as treasurer, violated 2 U.S.C. § 433(c), 434(a)(6), and 441a(f). On June 1, July 5, July 26, and September 24, 1990, you submitted responses to the Commission's reason to believe findings and interrogatories and requests for documents.

After considering the circumstances of the matter, the Commission determined on November 14, 1990, to take no further action against the Committee and you, as treasurer, as it pertains to 2 U.S.C. § 433(c) and the contributions from the Republican National Committee, the National Republican Congressional Committee, the Republican Party of Florida, and Robin Kaskal.

On November 14, 1990, the Federal Election Commission found reason to believe that the Committee and you, as treasurer, violated 2 U.S.C. § 434(b), a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). However, after considering the circumstances of this matter, the Commission also determined to take no further action regarding 2 U.S.C. § 434(b). The Factual and Legal Analysis, which formed a basis for the Commission's finding, is attached for your information.

The Commission reminds you that failure to report outstanding debts of more than \$500 at the time of the transaction appears to be a violation of 2 U.S.C. § 434(b). You should take immediate steps to insure that this activity does not occur in the future.

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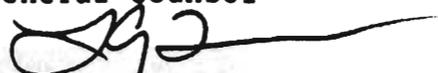
Jose M. Martinez-Armesto
Page 2

This matter will now move to the next stage of the enforcement process with regard to the remaining allegations: the receipt of alleged excessive contributions from the Republican Party of Dade County and three individuals and the failure to file certain 48-hour reports.

If you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

Enclosure
Factual and Legal Analysis

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FEDERAL ELECTION COMMISSION

FACTUAL AND LEGAL ANALYSIS

RESPONDENTS: Ileana Ros-Lehtinen for Congress **MUR 3054**
Committee and Jose M.
Martinez-Armesto, as treasurer

This finding was generated based on information ascertained by the Federal Election Commission ("the Commission") in the normal course of carrying out its supervisory responsibilities. See 2 U.S.C. § 437g(a)(2).

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that all political committees registered with the Commission shall file periodic reports of their receipts and disbursements that shall include "the amount and nature of outstanding debts and obligations owed by or to such political committee...." 2 U.S.C. § 434(b)(8). See 11 C.F.R. § 104.3(d). Commission regulations explain that these debts and obligations shall be reported on separate schedules. 11 C.F.R. § 104.11(a). The regulations further provide that debts and obligations of \$500 or less shall be reported as of the time payment is made or no later than 60 days after such obligation is incurred, whichever comes first. Moreover, any debt or obligation of more than \$500 shall be reported as of the time of the transaction. 11 C.F.R. § 104.11(b).

The Ileana Ros-Lehtinen for Congress Committee ("the Committee") initially filed a report covering the period from July 27, 1989 to August 9, 1989, that disclosed cash on hand of \$54,706 and no outstanding debts or obligations owed by the Committee. On July 5, 1990, after the initiation of this matter,

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the Committee filed an amended report for this period that disclosed outstanding debts owed by the Committee of \$22,919.40 and a negative cash on hand of \$2,757.21.

Therefore, there is reason to believe the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, violated 2 U.S.C. § 434(b).

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 30, 1990

Benjamin L. Ginsberg, Chief Counsel
Republican National Committee
310 First Street, S.E.
Washington, D.C. 20003

RE: MUR 3054
Republican National
Committee and William J.
McManus, as treasurer

Dear Mr. Ginsberg:

On April 26, 1990, you were notified that the Federal Election Commission found reason to believe that the Republican National Committee and William J. McManus, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a. On June 8, 1990, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of the matter, the Commission determined on November 14, 1990, to take no further action against the Republican National Committee and William J. McManus, as treasurer, and closed the file as it pertains to this Respondent. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Benjamin L. Ginsberg, Chief Counsel
Page 2

The Commission reminds you that failure to report proper election designation for contributions appears to be a violation of the Act. You should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

92040895141



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

November 30, 1990

Jan Witold Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20008

RE: MUR 3054
National Republican
Congressional Committee and
Nancy S. Marshall, as
assistant treasurer

Dear Mr. Baran:

On April 26, 1990, your clients were notified that the Federal Election Commission found reason to believe that the National Republican Congressional Committee and Jack McDonald, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a. On May 14, 1990, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of the matter, the Commission determined on November 14, 1990, to take no further action against the National Republican Congressional Committee and Nancy S. Marshall, as assistant treasurer, and closed the file as it pertains to this Respondent. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Jan Witold Baran, Esquire
Page 2

The Commission reminds you that failure to report proper election designation for contributions appears to be a violation of the Act. Your clients should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

92040895143



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

November 30, 1990

Jan Witold Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20008

RE: MUR 3054
Republican Party of Florida
and Shirlee Bowne, as
treasurer

Dear Mr. Baran:

On April 26, 1990, your clients were notified that the Federal Election Commission found reason to believe that the Republican Party of Florida and Shirlee Bowne, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a. On May 14, 1990, you submitted a response to the Commission's reason to believe findings.

After considering the circumstances of the matter, the Commission determined on November 14, 1990, to take no further action against the Republican Party of Florida and Shirlee Bowne, as treasurer, and closed the file as it pertains to this Respondent. The file will be made part of the public record within 30 days after this matter has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within ten days of your receipt of this letter. Such materials should be sent to the Office of the General Counsel.

The confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter is closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Jan Witold Baran, Esquire
Page 2

The Commission reminds you that failure to report proper election designation for contributions appears to be a violation of the Act. Your clients should take immediate steps to insure that this activity does not occur in the future.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel



BY: Lois G. Lerner
Associate General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

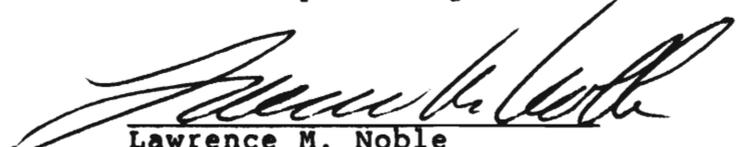
In the Matter of)
Ileana Ros-Lehtinen for Congress)
Committee and Jose M.)
Martinez-Armesto, as treasurer)
Republican Party of Dade County)
and David W. Southwell, as)
treasurer)

MUR 3054 **SENSITIVE**

GENERAL COUNSEL'S REPORT

The Office of the General Counsel is prepared to close the investigation in this matter as to the above-named respondents, based on the assessment of the information presently available.

12/18/80
Date


Lawrence M. Noble
General Counsel

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Ileana Ros-Lehtinen for Congress) MUR 3054
Committee and Jose M.)
Martinez-Armesto, as treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On April 19, 1990, the Commission found reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer¹ violated 2 U.S.C. §§ 434(a)(6) and 441a(f) and instituted an investigation into this matter. These findings related to its failure to file five 48-hour reports and the receipt of excessive contributions from three individuals and the Republican Party of Dade County.

The Ileana Ros-Lehtinen for Congress Committee ("the Ros-Lehtinen Committee") was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989. The Ros-Lehtinen Committee raised \$1,053,638 and spent \$1,052,562 with respect to the 1989 special elections and ended the year with cash on hand of \$1,086 and no debts outstanding. It filed four reports covering the

1. Subsequent to the findings but before the notification letters were sent, the General Counsel learned that the Committee had named Jose M. Martinez-Armesto as its new treasurer. Therefore, in accordance with Commission policy, his name has been substituted in this matter.

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period from June 6, 1989, to December 31, 1989. The committee has not yet terminated.

The Republican Party of Dade County is the recognized political committee of the Republican Party for Dade County, Florida. Its federal account is registered with the Commission as a federal political committee. It is a local party committee within the meaning of 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(e)(4) and a multicandidate political committee within the meaning of 2 U.S.C. § 441a(a)(4).

II. FACTUAL AND LEGAL ANALYSIS

A. The Ileana Ros-Lehtinen For Congress Committee Failed To File 48-Hour Notifications.

The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that the principal campaign committee of a candidate shall file notifications of any contribution of \$1,000 or more received by any authorized committee after the 20th day but more than 48 hours before any election. This notification shall be filed within 48 hours after the receipt of such contribution and shall include the name of the candidate and the office sought, the identification of the contributor, and the date of receipt and amount of the contribution. 2 U.S.C. § 434(a)(6)(A). This notification shall be in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(B). The Act defines "identification" to mean in the case of any individual, the name, the mailing address, and the occupation of each individual as well as the name of his or her employer and in the case of any other person, the full name and

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mailing address. 2 U.S.C. § 431(13).

A review of the reports filed by the Ros-Lehtinen Committee identified 25 contributions totaling \$29,000 that were received between the 20th day but more than 48 hours prior to the special general election. These contributions were received on the following dates and in the indicated aggregate amounts on those dates:

Date Received	Aggregate Amount
August 11th	\$7,000
August 16th	4,000
August 17th	2,000
August 21st	1,000
August 25th	<u>15,000</u>
Total	\$29,000

These contributions were not reported within 48 hours of their receipt as required by Section 434(a)(6).

Therefore, the General Counsel recommends that the Commission find probable cause to believe the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, violated 2 U.S.C. § 434(a)(6).

B. The Ileana Ros-Lehtinen For Congress Committee Knowingly Received Excessive Contributions From Three Individuals That Were Not Refunded Within The Regulatory Time Frame And Excessive Contributions From The Republican Party Of Dade County.

The Act provides that any person may contribute an aggregate of \$1,000 with respect to any election to a candidate for federal office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(2)(A). A political committee may not knowingly accept a

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contribution in excess of these limitations. 2 U.S.C. § 441a(f). The regulations also provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. 11 C.F.R. §§ 103.3(b) and 110.1 and 110.2. Party committees are incapable of making independent expenditures on behalf of their candidates. 11 C.F.R. § 110.7(b)(4).

1. Individual Excessive Contributions

A review of the reports of the principal and authorized campaign committees identified three individuals who made excessive contributions to the campaign. These contributions are those made by Frederick W. Guardabassi (\$500 in excessive contributions), Alma E. Morissette (\$1,000 in excessive contributions), and Fernando Rodriguez (\$300 in excessive contributions). In the case of the individual contributors, the contributor made contributions after the special primary election and before the special general election that in the aggregate exceeded the contributor's limitation with respect to the special general election. The Ros-Lehtinen Committee refunded the excessive portions of the contributions from these three individuals on May 31, 1990. These refunds were not made within the time frames of 11 C.F.R. § 103.3(b). Therefore, under the Act and regulations, the Ros-Lehtinen Committee is considered to have accepted these excessive contributions.

2. Republican Party of Dade County Excessive Contributions

The reports filed by the Republican Party of Florida ("Florida State Party") designated its August 9th \$5,000

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contribution as made for the special primary election and an August 7th \$4,500 contribution for the special general election (they were reported as received on the 9th and 11th respectively). In addition, the Ros-Lehtinen Committee also received a \$5,000 contribution from the Republican Party of Dade County ("Dade County") on August 11, 1989. The \$5,000 contribution from Dade County with respect to the general election (August 11) was made after the \$4,500 general election contribution from Florida (August 7).² Under Commission regulations, all contributions made by a state party committee and all subordinate state party committees, including local county committees, are presumed made by one committee. 11 C.F.R. § 110.3(b)(3). In the absence of evidence to rebut the presumption, the amount of the contribution by the Republican Party of Dade County is added to those by the Republican Party of Florida.

In addition, Dade County spent \$8,800 on radio ads on behalf of Ileana Ros-Lehtinen and two local candidates in the special general election. The allocation of one-third of the costs of these ads to Ileana Ros-Lehtinen's candidacy results in an in-kind contribution of \$2,734 to her committee in addition to the \$5,000 direct contribution. Because the Florida State Party had already made a \$4,500 contribution to the Ros-Lehtinen

2. The Ros-Lehtinen Committee states that the Dade County contribution was delivered by messenger on August 11. Florida issued and reported its general election contribution as made on August 7. The Ros-Lehtinen Committee reported its receipt on August 9.

Committee for the special general election, the aggregate amount of the Dade County contributions (\$7,734) exceeds the applicable limits by \$7,234. On November 13, 1990, the Ros-Lehtinen Committee refunded \$5,000 to the Florida State Party. This refund, however, was not made within the regulatory time frame to negate the acceptance of the Florida State Party's \$4,500 contribution for the special general election. See 11 C.F.R. § 103.3(b).

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The Act provides that all contributions made by political committees established, financed, maintained, or controlled by the same group of persons shall be considered to have been made by one political committee. 2 U.S.C. § 441a(a)(5). The Act further provides, however, that all contributions made by a single political committee established, financed, maintained, or controlled by a national committee of a political party and by a single committee established, financed, maintained, or controlled by the state committee of a political party shall not be considered to have been made by a single political committee. 2 U.S.C. § 441a(a)(5)(B). The regulations permit unlimited transfers between political committees of the same political party. See 11 C.F.R. § 102.6(a).

Commission regulations further provide that all contributions made by political committees established, financed, maintained, or controlled by a state party committee and by subordinate party committees shall be considered to have been made by one committee for purposes of the Act's limitations. 11 C.F.R. § 110.3(b)(3). This presumption does not apply if (1) the political committee of

the party unit in question has not received funds from any other political committee established, financed, maintained, or controlled by any party unit and (2) the political committee of the party unit in question does not make its contributions in cooperation, consultation or concert with, or at the request or suggestion of any other party unit. Both of these conditions must be met in order to rebut the presumption. See also, Explanation and Justification for 11 C.F.R. § 110.3(b)(3), 54 Fed. Reg. 34102 (1989) and Advisory Opinion 1978-9.

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The treasurer of the Florida State Party has stated under oath that to her knowledge "the Republican Party of Florida Federal Campaign Committee has not requested or suggested to the Republican Party of Dade County that it make specific contributions to federal, state or local candidates, nor has the Republican Party of Florida worked in concert or cooperation with the Republican Party of Dade County in making of any contributions to federal, state or local candidates." She further averred that "the Republican Party of Florida does not recognize the Republican Party of Dade County as an affiliated organization."³ Dade County has not made any statement to the Commission regarding this point.

The Florida State Party treasurer acknowledged that although Florida's federal account made no transfers to Dade County in 1987, 1988, or 1989, the nonfederal account issued these checks

3. Florida and Dade County have not listed each other as affiliated committees on their respective Statements of Organization.

to the nonfederal account of Dade County in these years:

Date	Amount
2/13/87	\$10.00
2/13/87	10.00
3/16/88	10.00
6/21/88	1,000.00
9/26/88	817.20
5/1/89	50.00
6/20/89	<u>1,000.00</u>
Total	\$2,897.20

As the Commission noted in the Explanation and Justification for 11 C.F.R. § 110.3(b)(3), "this provision also grants these party committees an opportunity to demonstrate that they qualify for an exemption from the affiliation rules, provided they can show they have not received funds from any other party committee and that they do not make contributions in cooperation, consultation, or concert with, or at the request or suggestion of, any other party unit or party committee." 54 Fed. Reg. 34102 (1989).

The advisory opinions in this area are not entirely clear on whether the transfers described in the regulation and the explanation and justification are limited to those between the party committees' respective federal accounts or also include transfers between nonfederal accounts. The regulation, however, refers to transfers from "any other political committee established, financed, maintained, or controlled by any party unit." 11 C.F.R. § 110.3(b)(3)(i). This language would appear to include transfers between the nonfederal accounts of the respective committees as well as transfers between their federal accounts.

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Because it appears that Dade County has received modest transfers from Florida in the years prior to the special general election, although apparently limited to their respective nonfederal accounts, Dade County does not appear able to rebut the presumption of affiliation. Therefore, the \$5,000 Dade County contribution remains aggregated with the \$4,500 Florida State Party contribution as made with respect to the special general election, resulting in an excessive contribution being made by Dade County and being knowingly accepted by the Ros-Lehtinen Committee of \$4,500.

The General Counsel also examined questions regarding the reporting and financing of alleged exempt payments by Dade County for its radio ads and whether any of these payments should also be considered contributions to the Ros-Lehtinen Committee.

Commission regulations provide that expenditures on behalf of more than one candidate shall be attributed to each candidate in proportion to, and shall be reported to reflect, the benefit reasonably expected to be derived. 11 C.F.R. § 106.1(a). The regulations make an exception to this rule for expenditures for registration or get-out-the-vote drives of committees, which need not be attributed to individual candidates unless these expenditures are made on behalf of a clearly identified candidate and the expenditure can be directly attributed to that

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candidate. 11 C.F.R. § 106.1(c)(2).⁴

Dade County reported \$8,800 in payments to Sanchez & Levitan Advertising Co. on August 25, 1989, and three radio stations on August 24, 1989, for a GOTV radio campaign. The treasurer of Dade County had stated that these expenditures had been made pursuant to authorization by the RNC and that Dade County had received \$7,000 for that purpose. The treasurer added that the \$7,000 transfer to Dade County was for the purpose of paying for "party building expenses relating to a Republican get-out-the-vote radio campaign." The wire transfer occurred on August 24, 1989.

Copies of the scripts used by Sanchez & Levitan for the radio ads were in Spanish. A translation by Commission staff shows that the ads consisted primarily of a message from party or elected officials urging listeners to vote for the Republican candidates for the state legislature and for Congress in the special election of August 29. The principal passages read:

Secure the election of Republican candidates to the Federal Congress as well as the senate and state legislature. They represent your values and your concerns.

...

On Tuesday, August 29th, your future and that of your

4. The Act and regulations also provide an exemption for registration and get-out-the-vote drives by state or local party committees on behalf of the party's presidential nominee. 2 U.S.C. § 431(8)(B)(xii) and 11 C.F.R. § 100.7(b)(17). If the drive includes references to candidates for the House and Senate, a portion of the costs is allocable to such candidates as a contribution or an expenditure unless the reference is incidental to the overall activity. 11 C.F.R. § 106.1(c)(3). Since the August 29, 1989, special general election did not include any presidential nominee, these provisions are not applicable. Instead, Commission regulations at 11 C.F.R. § 106.1(c)(2) govern Dade County's radio ads.

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family is at hand. Vote for the Republican candidates, in order to secure that your values are well represented.

...
(This is) Alberto Cardenas speaking to you. On Tuesday, August 29th, there are elections for the Federal Congress, the senate, and the state legislature. ...
Vote for your Republican candidates.

The Act and regulations define "clearly identified" to mean the name of the candidate appears, a photograph or drawing of the candidate appears, or "the identity of the candidate is apparent by unambiguous reference." 2 U.S.C. § 431(18) and 11 C.F.R. § 106.1(d). The U.S. Supreme Court has further stated that "clearly identified" would include references to the candidate's office, such as President or Governor, and to the candidate's status as a candidate, such as "the senatorial candidate of the Republican Party of Georgia." Buckley v. Valeo, 424 U.S. 1, 44 n.51 (1976). The August 29, 1989, election was a special election. Ileana Ros-Lehtinen was the only Republican candidate for Congress in that election. There can be no doubt as to who the ads referred to. These ads can be directly attributed to her. Therefore, the references to the Republican candidate for Congress in that election made her identity apparent by an unambiguous reference and, thus, sufficed to clearly identify her. See 11 C.F.R. § 106.1(c)(2). Thus, an allocated portion of these payments should have been reported as in-kind contributions to Ileana Ros-Lehtinen.

Because there were apparently three offices on the ballot for the August special election, the costs of these radio ads should have been apportioned one third to Ros-Lehtinen and two-thirds to

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the local candidates. 11 C.F.R. § 106.1(a). Since the total cost of the radio ads was \$8,800, one third of this cost or \$2,734 is allocable to Ileana Ros-Lehtinen's candidacy. When this amount is aggregated with the \$4,500 excessive contribution Dade County made directly to the Ros-Lehtinen Committee, the aggregate excessive contributions from Dade County to the Ros-Lehtinen Committee is \$7,234.

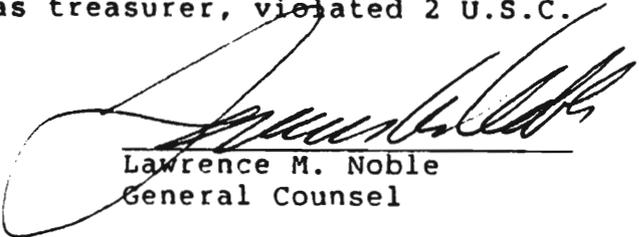
Therefore, the General Counsel recommends that the Commission find probable cause to believe the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, violated 2 U.S.C. § 441a(f).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, violated 2 U.S.C. § 434(a)(6).
2. Find probable cause to believe that the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, violated 2 U.S.C. § 441a(f).

Date

1/10/91


Lawrence M. Noble
General Counsel

92040895158



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2874
Miami, FL 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as treasurer

Dear Mr. Martinez-Armesto:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on April 19, 1990, the Federal Election Commission found reason to believe that Ileana Ros-Lehtinen for Congress ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(a)(6) and 441a(f), and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

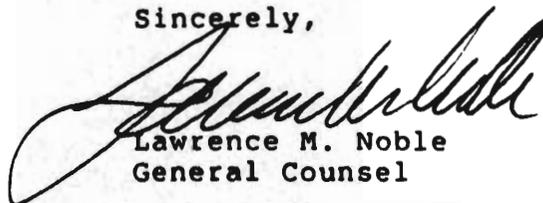
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Jose M. Martinez-Armesto
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

January 11, 1991

MEMORANDUM

TO: The Commission
FROM: Lawrence M. Noble *[Signature]*
General Counsel
SUBJECT: MUR 3054

Attached for the Commission's review are briefs stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of these briefs and letters notifying the respondents of the General Counsel's intent to recommend to the Commission findings of probable cause to believe were mailed on January 11, 1991. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

1. Briefs
2. Letters to respondents

Staff persons: George F. Rishel
Jeffrey D. Long

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

January 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David W. Southwell, Treasurer
Republican Party of Dade County
16857 N.W. 57th Avenue
Miami, FL 33055

RE: MUR 3054
Republican Party of Dade
County and David W. Southwell,
as treasurer

Dear Mr. Southwell:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, on April 19, 1990, the Federal Election Commission found reason to believe that the Republican Party of Dade County ("Committee") and you, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a, and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that violations have occurred.

The Commission may or may not approve the General Counsel's recommendation. Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within 15 days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of the General Counsel, if possible.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of whether there is probable cause to believe a violation has occurred.

If you are unable to file a responsive brief within 15 days, you may submit a written request for an extension of time. All requests for extensions of time must be submitted in writing five days prior to the due date, and good cause must be demonstrated. In addition, the Office of the General Counsel ordinarily will not give extensions beyond 20 days.

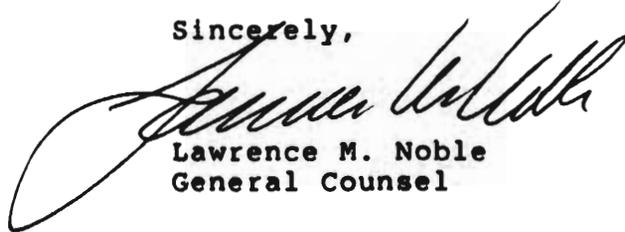
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David W. Southwell
Page 2

A finding of probable cause to believe requires that the Office of the General Counsel attempt for a period of not less than 30, but not more than 90 days, to settle this matter through a conciliation agreement.

Should you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Brief

cc: Maria Alonso-Martinez, Chairman
Republican Party of Dade County
2905 Salzedo Avenue
Coral Gables, FL 33134

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Republican Party of Dade County) MUR 3054
and David W. Southwell, as)
treasurer)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On April 19, 1990, the Commission found reason to believe the Republican Party of Dade County and David W. Southwell, as treasurer ("Dade County") violated 2 U.S.C. §§ 434(b) and 441a and instituted an investigation into this matter. These findings related to the making of excessive contributions to the Ileana Ros-Lehtinen for Congress Committee ("Ros-Lehtinen Committee") and the failure to report properly payments on behalf of the candidacy of Ileana Ros-Lehtinen.

Dade County is the recognized political committee of the Republican Party for Dade County, Florida. Its federal account is registered with the Commission as a federal political committee. It is a local party committee within the meaning of 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(e)(4) and a multicandidate political committee within the meaning of 2 U.S.C. § 441a(a)(4). The Ros-Lehtinen Committee was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989.

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II. FACTUAL AND LEGAL ANALYSIS

A. The Republican Party Of Dade County Made Excessive Contributions to The Ileana Ros-Lehtinen For Congress Committee.

The Act provides that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C.

§ 441a(a)(2)(A). Party committees are incapable of making independent expenditures on behalf of their candidates.

11 C.F.R. § 110.7(b)(4).

The reports filed by the Republican Party of Florida ("Florida State Party") designated its August 9th \$5,000 contribution as made for the special primary election and an August 7th \$4,500 contribution for the special general election (they were reported as received on the 9th and 11th respectively). In addition, the Ros-Lehtinen Committee also received a \$5,000 contribution from the Republican Party of Dade County ("Dade County") on August 11, 1989. The \$5,000 contribution from Dade County with respect to the general election (August 11) was made after the \$4,500 general election contribution from Florida (August 7).¹ Under Commission regulations, all contributions made by a state party committee and all subordinate state party committees, including local county committees, are presumed made by one committee. 11 C.F.R.

1. The Ros-Lehtinen Committee states that the Dade County contribution was delivered by messenger on August 11. Florida issued and reported its general election contribution as made on August 7. The Ros-Lehtinen Committee reported its receipt on August 9.

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§ 110.3(b)(3). In the absence of evidence to rebut the presumption, the amount of the contribution by the Republican Party of Dade County is added to those by the Republican Party of Florida.

In addition, Dade County spent \$8,800 on radio ads on behalf of Ileana Ros-Lehtinen and two local candidates in the special general election. The allocation of one-third of the costs of these ads to Ileana Ros-Lehtinen's candidacy results in an in-kind contribution of \$2,734 to her committee in addition to the \$5,000 direct contribution. Because the Florida State Party had already made a \$4,500 contribution to the Ros-Lehtinen Committee for the special general election, the aggregate amount of the Dade County contributions (\$7,734) exceeds the applicable limits by \$7,234. On November 13, 1990, the Ros-Lehtinen Committee refunded \$5,000 to the Florida State Party. This refund, however, was not made within the regulatory time frame to negate the acceptance of the Florida State Party's \$4,500 contribution for the special general election. See 11 C.F.R. § 103.3(b).

The Act provides that all contributions made by political committees established, financed, maintained, or controlled by the same group of persons shall be considered to have been made by one political committee. 2 U.S.C. § 441a(a)(5). The Act further provides, however, that all contributions made by a single political committee established, financed, maintained, or controlled by a national committee of a political party and by a single committee established, financed, maintained, or controlled

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by the state committee of a political party shall not be considered to have been made by a single political committee. 2 U.S.C. § 441a(a)(5)(B). The regulations permit unlimited transfers between political committees of the same political party. See 11 C.F.R. § 102.6(a).

Commission regulations further provide that all contributions made by political committees established, financed, maintained, or controlled by a state party committee and by subordinate party committees shall be considered to have been made by one committee for purposes of the Act's limitations. 11 C.F.R. § 110.3(b)(3). This presumption does not apply if (1) the political committee of the party unit in question has not received funds from any other political committee established, financed, maintained, or controlled by any party unit and (2) the political committee of the party unit in question does not make its contributions in cooperation, consultation or concert with, or at the request or suggestion of any other party unit. Both of these conditions must be met in order to rebut the presumption. See also, Explanation and Justification for 11 C.F.R. § 110.3(b)(3), 54 Fed. Reg. 34102 (1989) and Advisory Opinion 1978-9.

The treasurer of the Florida State Party has stated under oath that to her knowledge "the Republican Party of Florida Federal Campaign Committee has not requested or suggested to the Republican Party of Dade County that it make specific contributions to federal, state or local candidates, nor has the Republican Party of Florida worked in concert or cooperation with the Republican Party of Dade County in making of any

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contributions to federal, state or local candidates." She further averred that "the Republican Party of Florida does not recognize the Republican Party of Dade County as an affiliated organization."² Dade County has not made any statement to the Commission regarding this point.

The Florida State Party treasurer acknowledged that although Florida's federal account made no transfers to Dade County in 1987, 1988, or 1989, the nonfederal account issued these checks to the nonfederal account of Dade County in these years:

Date	Amount
2/13/87	\$10.00
2/13/87	10.00
3/16/88	10.00
6/21/88	1,000.00
9/26/88	817.20
5/1/89	50.00
6/20/89	<u>1,000.00</u>
Total	\$2,897.20

As the Commission noted in the Explanation and Justification for 11 C.F.R. § 110.3(b)(3), "this provision also grants these party committees an opportunity to demonstrate that they qualify for an exemption from the affiliation rules, provided they can show they have not received funds from any other party committee and that they do not make contributions in cooperation, consultation, or concert with, or at the request or suggestion of, any other party unit or party committee." 54 Fed. Reg. 34102 (1989).

2. Florida and Dade County have not listed each other as affiliated committees on their respective Statements of Organization.

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The advisory opinions in this area are not entirely clear on whether the transfers described in the regulation and the explanation and justification are limited to those between the party committees' respective federal accounts or also include transfers between nonfederal accounts. The regulation, however, refers to transfers from "any other political committee established, financed, maintained, or controlled by any party unit." 11 C.F.R. § 110.3(b)(3)(i). This language would appear to include transfers between the nonfederal accounts of the respective committees as well as transfers between their federal accounts.

Because it appears that Dade County has received modest transfers from Florida in the years prior to the special general election, although apparently limited to their respective nonfederal accounts, Dade County does not appear able to rebut the presumption of affiliation. Therefore, the \$5,000 Dade County contribution remains aggregated with the \$4,500 Florida State Party contribution as made with respect to the special general election, resulting in an excessive contribution being made by Dade County of \$4,500.

The General Counsel also examined questions regarding the reporting and financing of alleged exempt payments by Dade County for its radio ads and whether any of these payments should also be considered contributions to the Ros-Lehtinen Committee.

Commission regulations provide that expenditures on behalf of more than one candidate shall be attributed to each candidate in proportion to, and shall be reported to reflect, the benefit

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reasonably expected to be derived. 11 C.F.R. § 106.1(a). The regulations make an exception to this rule for expenditures for registration or get-out-the-vote drives of committees, which need not be attributed to individual candidates unless these expenditures are made on behalf of a clearly identified candidate and the expenditure can be directly attributed to that candidate. 11 C.F.R. § 106.1(c)(2).³

Dade County reported \$8,800 in payments to Sanchez & Levitan Advertising Co. on August 25, 1989, and three radio stations on August 24, 1989, for a GOTV radio campaign. The treasurer of Dade County had stated that these expenditures had been made pursuant to authorization by the RNC and that Dade County had received \$7,000 for that purpose. The treasurer added that the \$7,000 transfer to Dade County was for the purpose of paying for "party building expenses relating to a Republican get-out-the-vote radio campaign." The wire transfer occurred on August 24, 1989.

Copies of the scripts used by Sanchez & Levitan for the radio ads were in Spanish. A translation by Commission staff shows that the ads consisted primarily of a message from party or

3. The Act and regulations also provide an exemption for registration and get-out-the-vote drives by state or local party committees on behalf of the party's presidential nominee. 2 U.S.C. § 431(8)(B)(xii) and 11 C.F.R. § 100.7(b)(17). If the drive includes references to candidates for the House and Senate, a portion of the costs is allocable to such candidates as a contribution or an expenditure unless the reference is incidental to the overall activity. 11 C.F.R. § 106.1(c)(3). Since the August 29, 1989, special general election did not include any presidential nominee, these provisions are not applicable. Instead, Commission regulations at 11 C.F.R. § 106.1(c)(2) govern Dade County's radio ads.

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elected officials urging listeners to vote for the Republican candidates for the state legislature and for Congress in the special election of August 29. The principal passages read:

Secure the election of Republican candidates to the Federal Congress as well as the senate and state legislature. They represent your values and your concerns.

...
On Tuesday, August 29th, your future and that of your family is at hand. Vote for the Republican candidates, in order to secure that your values are well represented.

...
(This is) Alberto Cardenas speaking to you. On Tuesday, August 29th, there are elections for the Federal Congress, the senate, and the state legislature. ...
Vote for your Republican candidates.

The Act and regulations define "clearly identified" to mean the name of the candidate appears, a photograph or drawing of the candidate appears, or "the identity of the candidate is apparent by unambiguous reference." 2 U.S.C. § 431(18) and 11 C.F.R. § 106.1(d). The U.S. Supreme Court has further stated that "clearly identified" would include references to the candidate's office, such as President or Governor, and to the candidate's status as a candidate, such as "the senatorial candidate of the Republican Party of Georgia." Buckley v. Valeo, 424 U.S. 1, 44 n.51 (1976). The August 29, 1989, election was a special election. Ileana Ros-Lehtinen was the only Republican candidate for Congress in that election. There can be no doubt as to who the ads referred to. These ads can be directly attributed to her. Therefore, the references to the Republican candidate for Congress in that election made her identity apparent by an unambiguous reference and, thus, sufficed to clearly identify

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her. Thus, an allocated portion of these payments should have been reported as in-kind contributions to Ileana Ros-Lehtinen.

Because there were apparently three offices on the ballot for the August special election, the costs of these radio ads should have been apportioned one third to Ros-Lehtinen and two-thirds to the local candidates. 11 C.F.R. § 106.1(a). Since the total cost of the radio ads was \$8,800, one third of this cost or \$2,933 is allocable to Ileana Ros-Lehtinen's candidacy. When this amount is aggregated with the \$4,500 excessive contribution Dade County made directly to the Ros-Lehtinen Committee, the aggregate excessive contributions from Dade County to the Ros-Lehtinen Committee is \$7,433.

Therefore, the General Counsel recommends that the Commission find probable cause to believe the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. § 441a.

B. The Republican Party Of Dade County Misreported Exempt Payments As Coordinated Party Expenditures.

The Act gives special expenditure authority to the national committee of a political party and the state committee of a political party with respect to elections for the House of Representatives and the United States Senate. 2 U.S.C. § 441a(d)(3). The coordinated party expenditure limitation with respect to the 1989 special general election was \$23,990 each for the Republican Party of Florida and the Republican National Committee ("RNC"). The Commission has recognized that these committees may make such expenditures through any designated

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agent including other party committees. The Republican Party of Florida and the RNC authorized the National Republican Congressional Committee ("NRCC") to utilize their coordinated party expenditure limitations on behalf of Ileana Ros-Lehtinen.

The NRCC reported making \$47,836 in coordinated party expenditures on behalf of Ileana Ros-Lehtinen, which is \$146 less than the aggregate coordinated party expenditure limit. The treasurer of Dade County also claimed Dade County had authorization from the RNC to make coordinated party expenditures. The RNC stated in an affidavit by its treasurer that it "had no record of any authorization to the Republican Party of Dade County to make §441a(d) expenditures."

Nevertheless, Dade County reported making coordinated party expenditures on behalf of Ms. Ros-Lehtinen in the amount of \$4,747.74. These expenditures were to Dodd Printers of Hialeah in two payments on August 25, 1989, of \$3,799.04 and \$948.70, for campaign material. As noted, neither Florida nor the RNC authorized Dade County to make such payments, and Dade County had no limit of its own by which it could make such payments. The payments to Dodd Printers were for a campaign brochure, bumper stickers, and fans which clearly identified Ileana Ros-Lehtinen. For the period from July 1 to September 18, 1989, Dade County reported no payments for postage, mailings, or mailing lists or to any vendors other than Dodd Printers, Sanchez & Levitan, and the radio stations.

The Act and regulations specifically permit a local party committee to make such payments in connection with volunteer

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activity (and subject to certain other requirements) without the payments being considered a contribution or expenditure under the Act. 2 U.S.C. §§ 431(8)(B)(x) and 431(9)(B)(viii). Because these items were apparently distributed by volunteers and not through direct mail, it appears that these payments would qualify for this exemption.⁴ Thus, Dade County has misreported these payments as coordinated party expenditures rather than as operating expenditures.

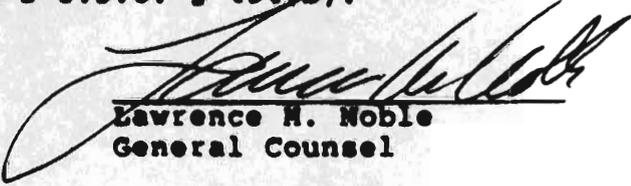
Accordingly, the General Counsel recommends that the Commission find probable cause to believe the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. § 434(b).

III. GENERAL COUNSEL'S RECOMMENDATIONS

1. Find probable cause to believe that the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. § 441a.
2. Find probable cause to believe that the Republican Party of Dade County and David W. Southwell, as treasurer, violated 2 U.S.C. § 434(b).

Date

4/10/91


Lawrence M. Noble
General Counsel

4. The \$7,000 transfer from the RNC was designated for the radio ads and was used for that purpose. The reports filed by Dade County indicate that at the time of the payment to Dodd Printing, Dade County had sufficient funds on hand from sources other than the RNC to make the payments.

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OGC 0010

DAVID W. SOUTHWELL

January 25, 1991

Lawrence M. Noble
Federal Election Commission
Washington, D.C. 20463

91 FEB -4 PH 3:54

RECEIVED
FEDERAL ELECTION COMMISSION

Dear Mr. Noble:

RE: MUR 3054

On November 8, 1989 the Commission received a complaint from the undersigned - which was identified as MUR 3003. The Commission, based upon the recommendation of your office, written by Anne Weissenborn, ruled on that complaint in June of 1990. The recommendation of Anne Weissenborn, which apparently formed the basis for the decision of the Commissioners, was based upon affidavits and other information which was, in my opinion, inaccurate, incomplete and misleading. I had informed Ms. Weissenborn, in advance, that it was very likely that she would receive a response of that character, and requested, on numerous occasions, the opportunity to review and comment upon the respondents response prior to the Commissioners acting upon the matter.

Upon being advised that there were private meetings (neither I nor my representative were invited) between your staff and the respondents attorney, I again expressed my concern that the investigation be conducted in the open and that I be given the opportunity to comment on their response. I was denied that opportunity - let the words "Due Process" and "Equal Justice Under the Law" never be spoken in the halls of the FEC except in shame!

After the Commissioners made their ruling, I was provided a copy of their response and a copy of the brief filed by Ms. Weissenborn. The cover letter to that informed me that if I did not agree with the findings, I could always resort to the courts. I immediately called Ms. Weissenborn and pointed out to her the specific inaccuracies and misinformation contained in the affidavit included with the demeaning letter written by the respondents attorney.

Although I have come to believe that statement made to me just prior to my filing the original complaint, that "The FEC is an agency formed by politicians to protect politicians from responsibility to the people they serve", I still believe that the Commissioners would have ruled differently if they had been presented with complete and accurate information.

Now, I have received MUR 3054, in which I am named as a party. This MUR 3054 has to do with the specific items about which I complained! Those expenditures were made without my knowledge or consent, were made by people who had arranged to have my name taken off of the approved list of check signers at the bank (even though I was, and still am, the Treasurer). Those expenditures, judging by MUR 3054, were also made without the approval of either the National or State Party and without the approval of Ros-Lehtinen - all of which corroborates my complaint.

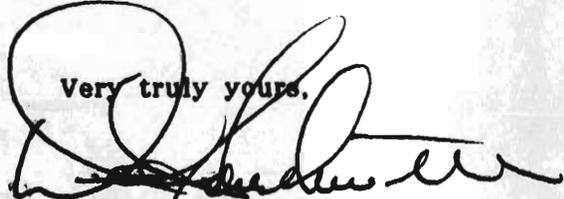
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It should be clear by now that the subject expenditures were made by a small group of people, acting without proper authorization, who apparently believed they could use Republican Party funds for their own personal political advancement - may I suggest that it would be more appropriate for you to direct your inquiries to those individuals rather than to those who were, in my opinion, wronged by their action.

Please have my name and the Dade County Party's name removed from this MUR 3054, as your complaint is not with the Party, but with that small group of individuals which your own - belated - investigation has clearly established were acting arbitrarily. Might I also suggest that it would obviously be appropriate for your office to reopen MUR 3003 - since it was your office's unwillingness to properly and timely investigate the matter which led to that matter being inappropriately ruled upon and to the opening of MUR 3054.

I am returning the MUR 3054 document you sent in its original envelope for proper disposition.

Very truly yours,


David W. Southwell

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HOUSE OF REPRESENTATIVES

06C 0064
RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB 12 AM 10: 12

ILEANA ROS-LEHTINEN

2227 Coral Way
Miami, FL 33145-3508
(305) 859-8414
Fax: (305) 859-8984

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 FEB 12 PM 2:47

February 11, 1991

Mr. Lawrence M. Noble
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

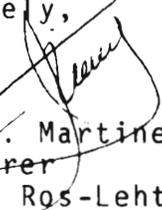
RE: MUR 3054

Dear Mr. Noble:

With regard to your letter dated January 11, 1991, and received January 25, 1991, the Ileana Ros-Lehtinen for Congress Committee respectfully requests an extension of time until March 1, 1991, to submit a response in the matter of MUR 3054.

We feel this extension is necessary in order to respond to an area discussed in the brief which does not appear to have been included in any previous "Interrogatories and Request for Documents" received by the Committee. Thank you for your consideration of this extension request.

Sincerely,


Jose M. Martinez-Armesto
Treasurer
Ileana Ros-Lehtinen for Congress-1989

92040895177



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 19, 1991

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2874
Miami, FL 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as
treasurer

Dear Mr. Martinez-Armesto:

This is in response to your letter dated February 1, 1991, which we received on February 12, 1991, requesting an extension until March 1, 1991 to respond to the Interrogatories and Request for Documents in the above-captioned matter. After considering the circumstances presented in your letter, I have granted the requested extension. Accordingly, your response is due by the close of business on March 1, 1991.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in black ink, appearing to be "LGL", with a long horizontal line extending to the right.

BY: Lois G. Lerner
Associate General Counsel

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RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

91 FEB 28 AM 11:07

HOUSE OF REPRESENTATIVES

ILEANA ROS-LEHTINEN

P.O. Box 52-2784
Miami, FL 33152-2784

February 27, 1991

Mr. Lawrence M. Noble
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

RE: MUR 3054

91 FEB 28 PM 12:04

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

Dear Mr. Noble:

This letter will serve as the response of the Ileana Ros-Lehtinen for Congress Committee (FEC ID# C00236976) in the matter of MUR 3054.

A. The first item in the Factual and Legal Analysis addresses the filing of 48-hour notice reports. The Committee would emphasize to the Commission once again that the Committee operated in the belief that all filing obligations were being met during the campaign, and that the situation involving these 48-hour notice reports was one of the strongest factors leading to the dismissal of the former Treasurer, Richard Tonkinson.

B. As noted in the MUR, the Committee has already refunded the excessive contribution amounts to the individuals listed, and has provided evidence of such to the Commission. The Committee made these refunds as soon as it became aware that they were required.

The Committee did accept contributions from both the Republican Party of Florida and the Dade County Republican Party as stated in the MUR. The Committee was not aware that these were considered affiliated committees under FEC regulations, which required them to operate under a shared contribution limit. Indeed, the Dade County Republican Party continues to insist that it operates independently of the Republican Party of Florida, and that these two committees should not be considered affiliated committees.

Nonetheless, once this situation became known to us, and in order to remove our Committee as a factor in this dispute, the Committee refunded \$5,000 to the Republican Party of Florida, as

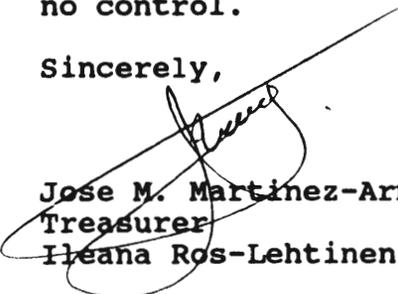
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noted in the MUR. The Committee cannot presume to speak on behalf of either the Republican Party of Florida nor the Dade County Republican Party, and can only stress that the contributions were accepted in good faith as legal at the time they were received.

With regard to the radio ads addressed in the MUR, an issue not previously raised in any of the Commission's Interrogatories relating to this MUR, the Committee has also requested and received the Spanish language texts of these ads, and accepts the English translation as provided in the MUR. We note that none of the ads used mentioned Ileana Ros-Lehtinen or any other candidate by name.

Here again, the Committee cannot speak on behalf of the Dade County Republican Party in so far as its position on the generic nature of these ads. The Committee did not provide the Dade County Republican Party with the texts of these ads, nor did we consult with them in preparation of the ads. Whether or not the ads qualify as exceptions under 11 CFR 106.1 (c) (2), the Committee strongly urges that it not be held responsible for a situation in which it had no active participation, and over which it exercised no control.

Sincerely,


Jose M. Martinez-Armesto
Treasurer
Ileana Ros-Lehtinen for Congress

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 11, 1991

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Maria Alonso-Martinez, Chairman
Republican Party of Dade County
2905 Salzedo Avenue
Coral Gables, FL 33134

RE: MUR 3054
Republican Party of Dade
County and its treasurer

Dear Chairman Alonso-Martinez:

On January 11, 1991, a brief stating the position of the General Counsel on the legal and factual issues in this matter under review was mailed to David Southwell, then the treasurer of the Republican Party of Dade County. A copy was also sent to you. This brief and accompanying letter notified you of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe the Republican Party of Dade County and its treasurer violated 2 U.S.C. §§ 441a and 434(b).

A response to the brief was received from David Southwell; however, it did not respond to the substantive issues raised in the brief. A copy of his response is enclosed. This Office has now learned that David Southwell has resigned as treasurer. You should notify the Commission of the appointment of a new treasurer within 10 days of such appointment pursuant to 2 U.S.C. § 433(c).

Because of these developments, you may have 15 days from your receipt of this letter to file a response to the brief. Another copy of the brief is enclosed. If no response is received within 15 days of your receipt of this letter, this Office will circulate a report to the Commission recommending a finding of probable cause. You should submit 10 copies of your response to the Secretary of the Commission, and forward 3 copies to the Office of the General Counsel.

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Maria Alonso-Martinez

Page 2

Should you have any questions, please contact Jeffrey D. Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel


BY: Lois G. Lerner
Associate General Counsel

Enclosures
Brief
Designation of Counsel Form
Southwell response

9 2 0 4 0 8 9 5 1 8 2

STATEMENT OF DESIGNATION OF COUNSEL

NUR 3054

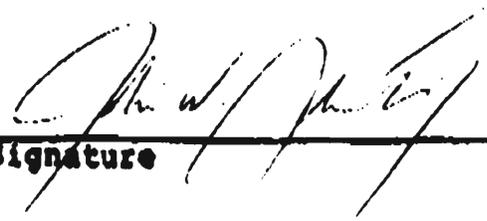
NAME OF COUNSEL: see Attached

ADDRESS: _____

TELEPHONE: _____

The above-named individual is hereby designated as my counsel and is authorized to receive any notifications and other communications from the Commission and to act on my behalf before the Commission.

3/19/91
Date


Signature

RESPONDENT'S NAME: John W. Schmitz, Chairman

ADDRESS: Republican Party of Dade County

2905 Salzedo Street

Coral Gables, -Fl 33134

HOME PHONE: _____

BUSINESS PHONE: (305) 443-1676

92040895183

William Wood, Esq.
One Biscayne Tower
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Robert Martinez, Esq.
Zackerman, Spaeder, Taylor & Evans
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Suite 900
Miami, FL 33131
(305) 579-0110

Alvin E. Entin, Esq.
Entin, Schwartz, et., al
2450 NE Miami Gardens Drive.
Miami, FL 33130
(305) 932-0550

9 2 0 4 0 3 9 5 1 8 4

06C 0455

ZUCKERMAN, SPAEDER, TAYLOR & EVANS

ATTORNEYS AT LAW

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TELECOPIER

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FORT LAUDERDALE, FLORIDA 33304

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WASHINGTON, D. C. 20036

(202) 778-1800

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300 EAST LOMBARD STREET

BALTIMORE, MARYLAND 21202

(301) 332-0444

EDWARD C. BERNOWITZ

JUDITH STURTZ KARP

ERIC F. FACER

MARY LOUISE AMERINE

ROBIN B. TAUB

DAVID A. HICKERSON

LEBLIE M. BERGER

BLAIR G. BROWN

HOYUN KIM

KERRY W. KIRCHER

KONNA M. CLARK

ROSEMARIE SCHMIDT

BARBARA KRAMER MORGAN

DEBORAH J. JEFFREY

GARY D. WEINFELD

ANNE-MARIE GRANDE

BARBARA L. WARD

LOUISE A. STOVALL

JULIE A. MACR

THOMAS B. MASON

RESIDENT IN BALTIMORE⁴

HERBERT BETTER

DONALD J. MCCARTNEY

MELISSA HAMMERSLEY CLARK

CYRIL V. SMITH

JOHN F. EVANS

(1941-1988)

RESIDENT IN FLORIDA

RONALD B. RAVIKOFF*

MICHAEL S. PASANO*

ROBERTO MARTINEZ

HUMBERTO J. PEÑA*

GUY A. RASCO*

BRYAN R. CLEVELAND

SHARON L. KEGERREIS

FREDERICK W. SALL

RESIDENT IN WASHINGTON, D.C.⁴

ROGER E. ZUCKERMAN

MARK W. FOSTER

ROGER C. SPAEDER

BRUCE GOLDSTEIN

WILLIAM W. TAYLOR, III

PETER R. KOLKER

JANET M. MEIBURGER

STEPHEN H. OLICKMAN

LAWRENCE A. KATZ

MICHAEL R. SMITH

ANTHONY THOMPSON

NELSON C. COHEN

STEVEN M. SALKY

* ALSO ADMITTED IN DISTRICT OF COLUMBIA

4 NOT ADMITTED IN FLORIDA

March 19, 1991

VIA TELEFAX AND MAILED

Jeffrey Long
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Re: **MUR 3054**

Dear Mr. Long:

This letter confirms our telephone conversation of this past Friday, March 15, 1991, relating to the above-referenced matter.

During our telephone conversation you advised me that MUR 3054 is an open and unresolved matter. This letter confirms our request for a forty-five (45) day period within which to respond to MUR 3054.

Additionally, please advise me of all pending MUR's and other matters relating to the Republican Party of Dade County ("the Party"). The Party wishes to address and resolve all matters pending before the F.E.C.

Thank you for your attention to this matter.

Sincerely,


Roberto Martinez, Esq.

RM/ae

cc: John W. Schmitz

RECEIVED
FEDERAL ELECTION COMMISSION
91 MAR 21 PM 3:25

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FEDERAL ELECTION COMMISSION
MAIL ROOM
91 MAR 21 PM 1:05

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91 MAR 25 PM 4:45



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

BY **SENSITIVE**

March 21, 1991

MEMORANDUM

TO: The Commission

FROM: Lawrence M. Noble
General Counsel

BY: Lois G. Lerner *LL*
Associate General Counsel

SUBJECT: MUR 3054
Request for Extension of Time

By letter dated March 19, 1991, Roberto Martinez requested an extension of 45 days in which to file a response brief in the above-referenced matter. (Attachment 1.) The extension is being requested because the committee has only recently retained Mr. Martinez for this matter.

The treasurer of the Committee responded on February 4, 1991, but did not address the substantive issues of the presumed affiliation between Dade County and the Florida Republican Party and the allocation of the costs of the radio ads paid for by Dade County in conjunction with the 1989 special election. Because the Commission voted on November 14, 1990 to brief the issues of affiliation and the radio ads, this Office recommends that the Commission grant the requested extension so that counsel may respond to these issues.

RECOMMENDATIONS

1. Grant an extension of 45 days to the Republican Party of Dade County and David Southwell, as treasurer.
2. Approve the appropriate letter.

Attachment
Request for Extension

Staff Assigned: Jeffrey Long

92040895186

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Request for Extension of Time.) MUR 3054

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 28, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 3054:

1. Grant an extension of 45 days to the Republican Party of Dade County and David Southwell, as treasurer, as recommended in the General Counsel's Memorandum dated March 21, 1991.
2. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated March 21, 1991.

Commissioners Aikens, Elliott, Josefiak, McGarry, and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

March 28, 1991
Date

Marjorie W. Emmons
for Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., Mar. 25, 1991 4:45 p.m.
Circulated to the Commission: Tues., Mar. 26, 1991 11:00 a.m.
Deadline for vote: Thurs., Mar. 28, 1991 11:00 a.m.

dr

92040895187



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 4, 1991

Roberto Martinez, Esquire
Zuckerman, Spaeder, Taylor & Evans
201 S. Biscayne Boulevard
Suite 900
Miami, Florida 33131

RE: MUR 3054
Republican Party of Dade
County and David W.
Southwell, as treasurer

Dear Mr. Martinez:

This is in response to your letter dated March 19, 1991, which we received on March 21, requesting an extension of 45 days to file a response brief in the above-referenced matter. After considering the circumstances presented in your letter, the Federal Election Commission has granted the requested extension. Accordingly, your response is due by the close of business on May 5, 1991.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in cursive script, appearing to read "Lawrence M. Noble", with a small mark above the end of the signature.

BY: Lois G. Lerner
Associate General Counsel

92040895188

ZUCKERMAN, SPAEDER, TAYLOR & EVANS

ATTORNEYS AT LAW

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WASHINGTON, D.C. 20036

(202) 778-1000

BALTIMORE OFFICE

500 EAST LONGFORD STREET

BALTIMORE, MARYLAND 21202

(301) 388-0444

May 3, 1991

EDWARD C. BERENSON

JUDITH STURTE RARE

ERIC F. FAGER

MARY LOUISE AMERINE

ROBIN S. TAYLOR

DAVID A. HICKERSON

LESLIE M. GERBER

BLAIR G. BROWN

MOTYU KIM

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KONNA M. CLARK

ROSEMARY SCHMIDT

BARBARA KRAMER HONAN

DEBORAH J. JEFFREY

GARY D. WEINFELD

ANNE-MARIE ORANGE

BARBARA L. WAIHU

LOUISE A. STOWALL

JULIE A. MACK

THOMAS S. MASON

* RESIDENT IN BALTIMORE *

HERBERT BETTER

DONALD J. MCCARTNEY

MELISSA HAMMERLEY CLARK

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JOHN F. EVANS

(410)-688-1000

RESIDENT IN FLORIDA

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FREDERICK W. SALL

RESIDENT IN WASHINGTON, D.C.*

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BRUCE GULSTEIN

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JANEY M. MEISBERG

STEPHEN M. OLICKMAN

LAWRENCE A. RAYZ

MICHAEL R. SMITH

ARTHUR THOMPSON

NELSON C. COHEN

STEVEN M. SALAT

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
& NOT ADMITTED IN FLORIDA

VIA TELEFAX

Jeffrey Long
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Re: MUR 3054

Dear Mr. Long:

Pursuant to my telephone conversation of today with your office, we are sending you this letter to request that your office grant us an additional thirty (30) day extension within which to file our response to MUR 3054.

Mr. Martinez, who is presently in Dallas, Texas and Washington, D.C., on pending litigation, has a meeting scheduled in Miami next week with some members of the Party who may have knowledge of the above-referenced matter. Due to the aforementioned, he is seeking this extension to allow him the opportunity to wrap-up the litigation matters he is presently involved in and also to give him an opportunity to meet with these party members and obtain any information they may have.

Please advise the undersigned if this extension will be granted by your office. Thank you for your courtesy and attention to this matter.

Sincerely,

Roberto Martinez
Roberto Martinez, Esq.

Signed in his absence to avoid delay

/ae

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RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY

91 MAY 13 AM 9:36



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

SENSITIVE

May 9, 1991

MEMORANDUM

TO: The Commission
FROM: Lawrence M. Noble
General Counsel
BY: Lois G. Lerner *LL*
Associate General Counsel
SUBJECT: MUR 3054
Request for Extension of Time

By letter dated May 3, 1991, Roberto Martinez requested an extension of 30 days in which to file a response brief in the above-referenced matter. (Attachment 1.) The extension is being requested to afford counsel additional time to prepare a response after his meeting with the party representatives on May 9, 1990.

This is the second request for an extension of time made by the Respondents. The first extension of 45 days was granted because the Committee had only recently retained counsel. This matter involves the issues of presumed affiliation between Dade County and the Florida Republican Party and the allocation of the costs of the radio ads paid for by Dade County in conjunction with the 1989 special election. Because of the importance the Commission has place on these issues of affiliation and the radio ads, this Office recommends that the Commission grant the requested extension so that counsel may respond to these issues.

RECOMMENDATIONS

1. Grant an extension of 30 days to the Republican Party of Dade County and David Southwell, as treasurer.
2. Approve the appropriate letter.

Attachment
Request for Extension

Staff Assigned: Jeffrey Long

92040395190

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Roberto Martinez) MUR 3054

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on May 15, 1991, the Commission decided by a vote of 5-0 to take the following actions in MUR 3054:

1. Grant an extension of 30 days to the Republican Party of Dade County and David Southwell, as treasurer.
2. Approve the appropriate letter, as recommended in the General Counsel's Memorandum dated May 9, 1991.

Commissioners Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Aikens did not cast a vote.

Attest:

5-16-91
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., May 13, 1991 9:36 a.m.
Circulated to the Commission: Mon., May 13, 1991 4:00 p.m.
Deadline for vote: Wed., May 15, 1991 4:00 p.m.

dr

92040895191



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 22, 1991

Roberto Martinez, Esquire
Zuckerman, Spaeder, Taylor & Evans
201 S. Biscayne Boulevard
Suite 900
Miami, Florida 33131

RE: MUR 3054
Republican Party of Dade
County and David W.
Southwell, as treasurer

Dear Mr. Martinez:

This is in response to your letter dated May 3, 1991, which we received on that day, requesting an extension of 30 days to file a response brief in the above-referenced matter. After considering the circumstances presented in your letter, the Federal Election Commission has granted the requested extension. Accordingly, your response is due by the close of business on June 4, 1991.

If you have any questions, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 376-5690.

Sincerely,

Lawrence M. Noble
General Counsel

A handwritten signature in dark ink, appearing to be "L. Lerner", written over a horizontal line.

BY: Lois G. Lerner
Associate General Counsel

92040895192

06-1563

ZUCKERMAN, SPAEDER, TAYLOR & EVANS

ATTORNEYS AT LAW

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BALTIMORE, MARYLAND 21202
(301) 332-0444

RESIDENT IN FLORIDA

RONALD B. RAVINOFF*
MICHAEL S. PASANO*
ROBERTO MARTINEZ
HUMBERTO J. PEÑA*
GUY A. RASCO*
BRYAN R. CLEVELAND
SHARON L. KEGERREIS
FREDERICK W. SALL

RESIDENT IN WASHINGTON, D.C. Δ

ROGER E. ZUCKERMAN
MARK W. FOSTER
ROGER C. SPAEDER
BRUCE GOLDSTEIN
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PETER R. KOLKER
JANET M. MEIBURGER
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LAWRENCE A. KATZ
MICHAEL R. SMITH
ANTHONY THOMPSON
NELSON C. COHEN
STEVEN M. SALKY

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
Δ NOT ADMITTED IN FLORIDA

EDWARD C. BERKOWITZ

JUDITH STURTZ KARP
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DAVID A. HICKERSON
LESLIE M. BERGER
BLAIR G. BROWN
HOYUN KIM
KERRY W. KIRCHER
KONNA M. CLARK
ROSEMARIE SCHMIDT
BARBARA KRAMER MORGAN
DEBORAH J. JEFFREY
GARY D. WEINFELD
ANNE-MARIE GRANDE
BARBARA L. WARD
LOUISE A. STOVALL
JULIE A. MACK
THOMAS B. MASON

RESIDENT IN BALTIMORE Δ

HERBERT BETTER
DONALD J. MCCARTNEY
MELISSA HAMMERSLEY CLARK
CYRIL V. SMITH

JOHN F. EVANS
(1941-1988)

June 10, 1991

Jeffrey Long
Federal Election Commission
999 E. Street, N.W.
Washington, D.C. 20463

Re: MUR 3054

Dear Jeff:

This letter will confirm our prior telephone conversations in connection with the above referenced matter. As I stated during our conversations, the Republican Party of Dade County is interested in resolving this matter and wishes to begin a process of conciliation in order to avoid a finding of probable cause and penalty. Accordingly the Republican Party of Dade County will not be filing any responsive brief.

As I have previously stated to you, the current Chairman and Board of Directors of the Republican Party of Dade County were not involved in the subject matter of MUR 3054. The present administration has attempted to fully comply with the pertinent rules and regulations under the law and has taken significant steps to avoid the problems that may have existed during the time period of the subject matter of MUR 3054. If necessary, I am available to meet with you in person in Washington, D.C. to personally discuss this matter. I am very interested in making sure that this matter is resolved to the satisfaction of the Federal Elections Commission but without a finding by the Commission which would financially penalize the Republican Party of Dade County. To that end, I believe that a meeting with you wherein I may fully explain the facts and the historical perspective might be mutually beneficial.

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Jeffrey Long
Federal Election Commission
June 10, 1991
Page 2

Thank you again for your time and patience. I look forward to hearing from you.

Sincerely,



Roberto Martinez Esq.

RM/ae

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91 JUN 26 PM 1:30

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
 Ileana Ros-Lehtinen for Congress)
 Committee and Jose M.)
 Martinez-Armesto, as treasurer) MUR 3054
)
 Republican Party of Dade County)
 and David W. Southwell, as)
 treasurer)

SENSITIVE

GENERAL COUNSEL'S REPORT

On January 11, 1991, the Office of the General Counsel mailed briefs recommending probable cause findings to the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, and the Republican Party of Dade County and David W. Southwell, as treasurer. A response was received from the Ileana Ros-Lehtinen for Congress Committee on February 28, 1991. On two occasions, March 28 and May 15, the Commission approved extensions of time to counsel for the Republican Party of Dade County. The latest extension gave counsel until June 4, 1991, to file a response.

When that date passed without receiving a response, staff of this office contacted counsel who indicated that he had elected not to file a response but indicated a willingness to settle the matter without any financial penalty for the Republican Party of Dade County. This Office requested that counsel send us a letter to that effect. On June 17, 1991, we received the attached letter from counsel.

Counsel states that the "Republican Party of Dade County is interested in resolving this matter and wishes to begin a process of conciliation in order to avoid a finding of probable cause and

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penalty. Accordingly the Republican Party of Dade County will not be filing any responsive brief." We note that Commission policy is not to enter into preprobable cause conciliation once probable cause briefs have been mailed. We further note that counsel's request comes five months after the mailing of the probable cause briefs.

Counsel further notes in his letter that he is available to meet with staff of this Office in Washington, D.C., to personally discuss the matter. Staff of this Office contacted counsel and arranged such a meeting for July 15, 1991. Therefore, we will postpone the probable cause report in this matter until after this meeting.

Lawrence M. Noble
General Counsel

June 24, 1991
Date

BY:

Lois G. Lerner
Lois G. Lerner
Associate General Counsel

Attachment

Staff person: Jeffrey D. Long

92040395196

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SECRETARIAT

91 NOV 19 PM 12: 58

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Ileana Ros-Lehtinen for Congress)
Committee and Jose M.)
Martinez-Armesto, as treasurer)
Republican Party of Dade County)
and Ernesto Martinez, as)
treasurer)

SENSITIVE

MUR 3054

DEC 3 1991

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

On April 19, 1990, the Commission found reason to believe the Ileana Ros-Lehtinen for Congress Committee and its treasurer² violated 2 U.S.C. §§ 434(a)(6) and 441a(f) and instituted an investigation into this matter. These findings related to its failure to file five 48-hour reports and the receipt of excessive contributions from three individuals and the Republican Party of Dade County. On April 19, 1990, the Commission also found reason to believe the Republican Party of Dade County and its treasurer ("Dade County") violated 2 U.S.C. §§ 434(b) and 441a and instituted an investigation into this matter. These findings related to the making of excessive contributions to the Ileana Ros-Lehtinen for Congress Committee ("Ros-Lehtinen Committee") and the failure to report properly payments on behalf of the candidacy of Ileana Ros-Lehtinen.

1. On November 4, 1991, the Committee notified the Commission that Ernesto Martinez has replaced David W. Southwell as treasurer.

2. Subsequent to the findings but before the notification letters were sent, the General Counsel learned that the Committee had named Jose M. Martinez-Armesto as its new treasurer. Therefore, in accordance with Commission policy, his name has been substituted in this matter.

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Dade County is the recognized political committee of the Republican Party for Dade County, Florida. Its federal account is registered with the Commission as a federal political committee. It is a local party committee within the meaning of 2 U.S.C. § 431(4)(C) and 11 C.F.R. § 100.5(e)(4) and a multicandidate political committee within the meaning of 2 U.S.C. § 441a(a)(4). The Ros-Lehtinen Committee was the principal campaign committee for Ileana Ros-Lehtinen, a candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989.

On January 11, 1991, the Office of the General Counsel mailed briefs recommending probable cause findings to the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, and the Republican Party of Dade County and its treasurer. A response was received from the Ileana Ros-Lehtinen for Congress Committee on February 28, 1991. On two occasions, March 28 and May 15, the Commission approved extensions of time to counsel for the Republican Party of Dade County. The latest extension gave counsel until June 4, 1991, to file a response. Counsel instead sent a letter asking to meet with staff on July 15, 1991. Such a meeting took place after which we anticipated receiving a response from counsel in this matter

After sending counsel a

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letter inquiring when we would receive such a response, counsel on October 22, 1991, sent by fax a letter stating that the party wished to go through conciliation in order to avoid a probable cause finding and that they therefore would not be filing a responsive brief. We had previously explained to counsel that once the briefs had been sent, opportunities for preprobable cause conciliation were no longer available.

Therefore, this report addresses the issues raised in the General Counsel's probable cause briefs.

II. FACTUAL AND LEGAL ANALYSIS

The General Counsel's Brief to the Ileana Ros-Lehtinen for Congress committee and the Republican Party of Dade County are incorporated by reference into this report.

A. Ros-Lehtinen Committee

As noted, the allegations relating to the Ileana Ros-Lehtinen for Congress committee relate to the failure to report certain last minute contributions, the receipt of excessive contributions from three individuals, and the receipt of excessive contributions from the Republican Party of Dade county.

1. 48 Hour Reports

As noted in the brief, the Ros-Lehtinen Committee failed to report \$29,000 in last minute contributions prior to the special general election. In response, the Committee states:

The Committee would emphasize to the Commission once again that the Committee operated in the belief that all filing obligations were being met during the campaign, and that the situation involving these 48-hour notice reports was one of the strongest factors leading to the dismissal of the former Treasurer, Richard Tonkinson.

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This response relates to mitigation of the violation. Therefore, we recommend that the Commission find probable cause to believe the Committee and its treasurer violated 2 U.S.C. § 434(a)(6).

2. Excessive Contributions

(a) Individuals

The brief also noted that the Ros-Lehtinen Committee had received excessive contributions from three individuals between the special primary and special general election aggregating \$1,800 in the excessive amount. The brief also noted that the excessive portions had been refunded in May 1990. The Committee notes that it made the refunds "as soon as it became aware that they were required." Nevertheless, these refunds were not made within the regulatory time frame to negate a violation. Instead, they serve merely to mitigate the violation.

(b) Republican Party of Dade County

The excessive contributions from the Republican Party of Dade County rest on two separate grounds: (1) the presumption of affiliation between the Republican Party of Florida and the Republican Party of Dade County; and (2) the allocation of payments for certain radio ads as made on behalf of the candidate.

The brief noted that the regulations create a presumption of affiliation between a state party committee and a local or county party committee of the same political party. The regulations also permit this presumption to be rebutted by a certain specific showing, including that the party unit in question has not received funds from the other unit and does not make

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contributions in coordination with the other unit. The brief recognized that the Republican Party of Florida denied it made contributions in coordination with the Republican Party of Dade County and that it did not recognize it as an affiliated organization. The brief, however, noted \$2,897 in transfers in 1987, 1988, and 1989 from the nonfederal account of the Republican Party of Florida to the nonfederal account of the Republican Party of Dade County. On that basis, we concluded that the presumption was not rebutted.

In response, the Ros-Lehtinen Committee states that it was not aware the Commission considered the two committees affiliated. It adds that the Republican Party of Dade County "continues to insist that it operates independently of the Republican Party of Florida." The Ros-Lehtinen Committee states that once it became aware of the presumption, it refunded \$5,000 to the Republican Party of Florida. The Republican Party of Dade County has not submitted a substantive response to this issue. The former treasurer, David W. Southwell, filed a response that repeats the allegations he made in his complaint in MUR 3003 that the expenditures by the Republican Party of Dade County were made by others without his authorization.

More recently, in a General Counsel's Report, signed October 14, 1991, in MUR 2938, this Office addressed the question whether the Kansas Republican State Committee and the Second District Republican Committee were affiliated for purposes of the Act's limitations. We noted that funds had been transferred from the nonfederal account of the Second District Republican Committee to

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the Kansas Republican State Committee. Nevertheless, because no funds had been transferred from the Second District Republican Committee to the state party's federal account, we concluded that the regulatory requirement to rebut the presumption of affiliation had been satisfied. The Commission agreed with our recommendation to take no further action in MUR 2938. In the situation of the Republican Party of Dade County and the Republican Party of Florida, the only transfer of funds has been between the state party's nonfederal account and the county party's nonfederal account. We have not uncovered any transfer of funds between the federal accounts of these two party committees. Therefore, based on the recent action in MUR 2938, we would now conclude that the regulatory requirements to rebut the presumption of affiliation between the Republican Party of Dade County and the Republican Party of Florida has been satisfied. Accordingly, the \$4,500 contribution from the Republican Party of Florida to the Ros-Lehtinen Committee would not be aggregated with the contributions from the Republican Party of Dade County.

The brief also noted that, in addition to a \$5,000 direct contribution to the Ros-Lehtinen Committee, the Republican Party of Dade County had also made \$8,800 in payments for radio ads on behalf of Ileana Ros-Lehtinen and two local candidates in the special election in 1989. We allocated \$2,734, or one-third of this amount, as an in-kind contribution to the Ros-Lehtinen

Committee.³ The Republican Party of Dade County has made no substantive response to this issue. The Ros-Lehtinen Committee said that as this issue was newly raised in the brief, it had obtained the Spanish language texts of the ads and accepts our English translation. The Committee added that it notes "that none of the ads used mentioned Ileana Ros-Lehtinen or any other candidate by name. Our view remains that the ads clearly identified Ileana Ros-Lehtinen in that she was the only candidate for Congress in the August special election.

Therefore, we conclude that the Republican Party of Dade County made total contributions of \$7,734 to the Ros-Lehtinen Committee with respect to the special general election, exceeding the Act's limitations by \$2,734.

3. Conclusion

The three individual excessive contributions aggregating \$1,800 and the \$2,734 excessive from the Republican Party of Dade County result in aggregate excessive contributions of \$4,534 being accepted by the Ros-Lehtinen Committee. According, we recommend that the Commission find probable cause to believe the Ros-Lehtinen Committee violated 2 U.S.C. § 441a(f).

B. Republican Party of Dade County

The issues with respect to the Republican Party of Dade

3. The former treasurer of the Republican Party of Dade County had claimed in a letter to the Reports Analysis Division that the committee had been authorized by the Republican National Committee to make coordinated party expenditures on behalf of Ms. Ros-Lehtinen. The RNC denied having done so, but instead transferred funds to the county committee for the purpose of generic get-out-the-vote activities.

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County include the making of excessive contributions to the Ros-Lehtinen Committee, discussed above, and the misreporting of exempt payments as coordinated party expenditures.

With regard to the making of excessive contributions to the Ros-Lehtinen Committee, we adopt the analysis set out above. Accordingly, we recommend that the Commission find probable cause to believe the Republican Party of Dade County violated 2 U.S.C. § 441a.

As the brief discusses, the Republican Party of Dade County reported making \$4,747.74 in coordinated party expenditures on behalf of Ileana Ros-Lehtinen. These expenditures consists of two payments to Dodd Printers of Hialeah for a campaign brochure, bumper stickers, and fans. The party reported no payments for mailings or postage. Thus, it appeared to us that these items had been distributed by volunteers rather than by direct mail. The county committee did not have any coordinated party expenditure limitation of it own. Neither the Republican National Committee nor the Republican Party of Florida authorized the Republican Party of Dade Committee to spend against either of their coordinated party expenditure limitations. Therefore, we concluded that these payments should have been reported as operating expenditures rather than as coordinated party expenditures.

Accordingly, we recommend that the Commission find probable cause to believe the Republican Party of Dade County violated 2 U.S.C. § 434(b).

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III. CONCILIATION AND PROPOSED CIVIL PENALTY

9 2 0 4 0 8 9 5 2 0 5

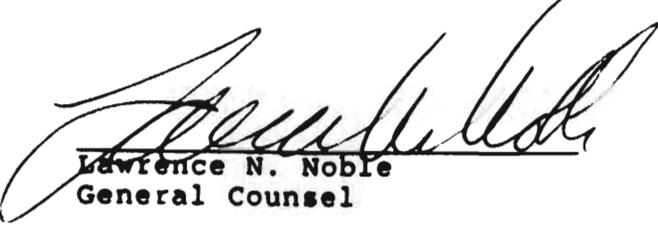
IV. RECOMMENDATIONS

1. Find probable cause to believe the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, violated 2 U.S.C. §§ 434(a)(6) and 441a(f).
2. Find probable cause to believe the Republican Party of Dade County and Ernesto Martinez, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.

3. Approve the attached conciliation agreements and appropriate letters.

Date

11/19/91


Lawrence N. Noble
General Counsel

Attachments

1. Responses (3)
2. Conciliation Agreements (2)

Staff persons: George F. Rishel
Jeffrey D. Long

92040895206

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Ileana Ros-Lehtinen for Congress) MUR 3054
Committee and Jose M. Martinez-Armesto,)
as treasurer;)
Republican Party of Dade County and)
Ernesto Martinez, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission executive session on December 3, 1991, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 3054:

1. Find probable cause to believe the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, violated 2 U.S.C. §§ 434(a)(6) and 441a(f).
2. Find probable cause to believe the Republican Party of Dade County and Ernesto Martinez, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a.

(continued)

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3. Approve the conciliation agreements and appropriate letters as recommended in the General Counsel's report dated November 19, 1991.

Commissioners Aikens, Elliott, Josefiak, McDonald, McGarry, and Thomas voted affirmatively for the decision.

Attest:

12-5-91
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

92040895208



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 11, 1991

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2784
Miami, Florida 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as treasurer

Dear Mr. Martinez-Armesto:

On December 3, 1991, the Federal Election Commission found that there is probable cause to believe Ileana Ros-Lehtinen for Congress and you, as treasurer, violated 2 U.S.C. §§ 434(a)(6) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended, in connection with the 1989 special election in the Eighteenth Congressional District in Florida.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

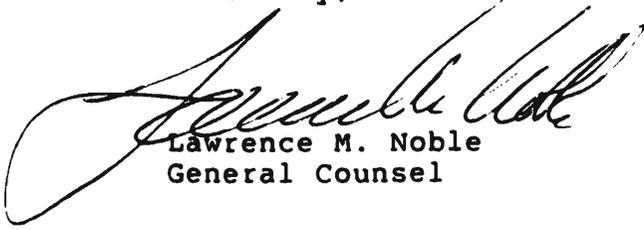
If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a

92040895209

Jose M. Martinez-Armesto, Treasurer
Page 2

meeting in connection with a mutually satisfactory conciliation agreement, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

92040895210



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 11, 1991

Roberto Martinez, Esquire
Zuckerman, Spaeder, Taylor & Evans
201 South Biscayne Boulevard
Miami, Florida 33131

RE: MUR 3054
Republican Party of Dade County
and Ernesto Martinez, as treasurer

Dear Mr. Martinez:

On December 3, 1991, the Federal Election Commission found that there is probable cause to believe your clients, the Republican Party of Dade County and Ernesto Martinez, as treasurer, violated 2 U.S.C. §§ 434(b) and 441a, provisions of the Federal Election Campaign Act of 1971, as amended, in connection with your clients' contributions and expenditures made during the 1989 special election in the Eighteenth Congressional District in Florida.

The Commission has a duty to attempt to correct such violations for a period of 30 to 90 days by informal methods of conference, conciliation, and persuasion, and by entering into a conciliation agreement with a respondent. If we are unable to reach an agreement during that period, the Commission may institute a civil suit in United States District Court and seek payment of a civil penalty.

Enclosed is a conciliation agreement that the Commission has approved in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten days. I will then recommend that the Commission accept the agreement. Please make your check for the civil penalty payable to the Federal Election Commission.

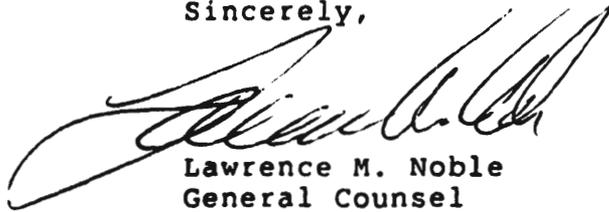
If you have any questions or suggestions for changes in the enclosed conciliation agreement, or if you wish to arrange a

92040895211

Roberto Martinez, Esquire
Page 2

meeting in connection with a mutually satisfactory conciliation agreement, please contact Jeffrey Long, the staff member assigned to this matter, at (202) 219-3690.

Sincerely,



Lawrence M. Noble
General Counsel

Enclosure
Conciliation Agreement

920408952121

ZUCKERMAN, SPAEDER, TAYLOR & EVANS

ATTORNEYS AT LAW

201 SOUTH BISCAYNE BOULEVARD
SUITE 900
MIAMI, FLORIDA 33131
(305) 579-0110

TELECOPIER
(305) 579-0749

TAMPA OFFICE
BARNETT PLAZA
101 EAST KENNEDY BOULEVARD, SUITE 310
TAMPA, FLORIDA 33602
(813) 221-1010

FORT LAUDERDALE OFFICE
1700 EAST SUNRISE BOULEVARD, SUITE 302
FORT LAUDERDALE, FLORIDA 33304
(305) 555-0531

WASHINGTON, D.C. OFFICE
1201 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036
(202) 778-1800

MARYLAND OFFICE
300 EAST LOMBARD STREET
BALTIMORE, MARYLAND 21202
(301) 332-0444

MARY LOUISE AMERINE
ROBIN S. TAUB
DAVID A. HICKERSON
LESLIE M. BERGER
BLAIR G. BROWN
MOTYU RIN
KERRY W. KURCHER
SONNA M. CLARR
ROSEMARIE SCHMIDT
BARBARA KEASER MORGAN
DEBORAH J. JEFFREY
GARY D. WEINFELD
ANNE-MARIE GRANDE
BARBARA L. WARD
LOUISE A. STOVALL
JULIE A. HACK
THOMAS B. MASON
MARTIN W. LESTER
BRUCE ANDR JAMES
RICHARD B. ROSENBLATT
ELEANOR H. SMITH
ELLEN FISHER MILLS
ALAN H. SCHEINER

RESIDENT IN MARYLAND⁴
HERBERT BETTER
DONALD J. MCCARTNEY
MELISSA HAMMERSLEY CLARR
CYRIL V. SMITH
MARTIN S. HINELED, JR.
JOHN P. EVANS
(1841-1888)

RESIDENT IN FLORIDA
RONALD B. RAVINOFF*
MICHAEL S. PASANO*
ROBERTO MARTINEZ
MORRIS WEINBERG, JR.*
JOHN F. LAURO*
HUMBERTO J. PERA*
GUY A. RASCO*
BRYAN R. CLEVELAND
SHARON L. KEGERRIC
FREDERICK W. SALL*

RESIDENT IN WASHINGTON, D.C.²
ROGER E. ZUCKERMAN
MARK W. FOSTER
ROGER C. SPAEDER
BRUCE GOLDBSTEIN
WILLIAM W. TAYLOR, III
PETER R. KOLKER
JANET M. NEIBURGER
STEPHEN H. GUCKMAN
LAWRENCE A. KATZ
MICHAEL R. SMITH
ANTHONY THOMPSON
NELSON C. COHEN
STEVEN M. SALT
EDWARD C. BERKOWITZ
JUDITH STURTZ KARP
ERIC P. FACER

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
2 NOT ADMITTED IN FLORIDA

December 19, 1991

VIA TELEFAX

Lawrence M. Noble, General
Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR 3054

Dear Mr. Noble:

On Monday, December 16, 1991, I received your letters of December 11, 1991, with the attached conciliation agreements for the above-referenced matters.

Due to the holiday season it will be impossible to complete the review of the proposed conciliation agreement with the Party's Chairman and Treasurer until after the new year. I therefore request that the FEC grant the Republican Party of Dade County until January 6, 1991, to respond to your letters re: MUR 3054 and

Thank you for your attention to this matter.

Sincerely,

Roberto Martinez
Roberto Martinez, Esq.

RM/ac

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91 DEC 19 PM 2:33

RECEIVED
FEDERAL ELECTION COMMISSION

HUCKABY AND ASSOCIATES

Political Financial Consulting

RECEIVED
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MAIL ROOM

91 DEC 23 PM 4:44

MUR
3054

VIA FAX TRANSMISSION

December 20, 1991

Mr. Jeffrey Long
Office of General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

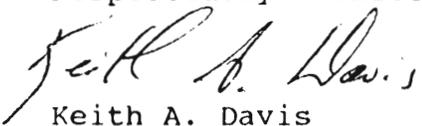
Dear Mr. Long:

In accordance with our telephone conversation this morning, I am hereby requesting an extension of time until January 10, 1991 for the Ileana Ros-Lehtinen for Congress Committee to respond to Mr. Lawrence M. Noble's letter regarding MUR 3054. This letter was dated December 11, 1991, and received by the committee on December 17, 1991.

The Committee is reviewing its records in regard to the issues raised in the MUR. With the holidays upcoming, and considering the travel schedules of committee officials, the Committee is requesting this extension in order to be able to ensure that its review is as thorough as possible prior to filing its response.

Your consideration of this extension request is appreciated.

Respectfully submitted:



Keith A. Davis
Committee Representative
Ileana Ros-Lehtinen for Congress

cc: Rep. Ileana Ros-Lehtinen
Mr. Jose M. Martinez-Armesto

RECEIVED
FEDERAL ELECTION COMMISSION
OFFICE OF GENERAL COUNSEL
91 DEC 27 AM 10:59

92040395214



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

December 23, 1991

Keith A. Davis
Huckaby and Associates
228 South Washington Street
Suite 201
Alexandria, Virginia 22314

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as treasurer

Dear Mr. Davis:

This is in response to your letter dated December 20, 1991, which we received on that day, requesting an extension until January 10, 1991 to respond in the above-referenced matter. After considering the circumstances presented in your letter, the Office of the General Counsel has granted the requested extension. Accordingly, your response is due by the close of business on January 10, 1991.

If you have any questions, please contact me at (202) 219-3690.

Sincerely,


Jeffrey D. Long
Paralegal

92040895215

LAW OFFICES
CORLETT, KILLIAN, OBER & LEVI

A PROFESSIONAL ASSOCIATION
118 WEST FLAGLER STREET
MIAMI, FLORIDA 33130

EDWARD S. CORLETT, III
A. DAN KILLIAN, JR.
FRED R. OBER
DONNA G. LEVI
SCOTT R. MENARY
JAMES P. MURRAY
ANDREW E. GRIOSBY
JOHN D. KENDE
ROBERT A. MERCER
NICHOLAS C. CHAREK
LOVE SHIPPS

TELEPHONE (305) 377-8831
CABLE ADDRESS "ADVOCOT"
TELEFAX (305) 372-8308

January 6, 1992

Lawrence M. Nobel, Esq.
General Counsel
Federal Election Commission
Washington, DC 20463

Certified Mail
Return Receipt Requested

Re: MUR 3054-Republican Party of Dade County
and Ernesto Martinez, as Treasurer

Dear Mr. Nobel:

As you are aware, the matters at issue basically boil down to two alleged violations. The first, relates to certain get-out-the-vote ("GOTV") radio advertising that was conducted by the party. The Commission contends that a portion of that expenditure should have been allocated as a contribution to the campaign of Ileana Ros-Lehtinen for Congress which would have resulted in an excess contribution in the amount of the allocation, about \$2,700. The second alleged violation has to do with various exempt payments made by the party which were erroneously reported as coordinated party expenditures instead of operating expenditures.

In considering these alleged violations, I think it is important to bear in mind that the purpose of the Federal Election Campaign Act of 1971, as amended, is a very specific one. As set forth by the Supreme Court in the seminal case of Buckley v. Valeo, 424 U.S. 1, 96 S.Ct. 612, 46 L.Ed.2d 659 (1976), the primary purpose of the Act is:

92040895216

Lawrence M. Nobel, Esq.
January 6, 1992
Page 2

...to limit the actuality and appearance of corruption resulting from large individual financial contributions.

96 S.Ct. at 638.

It is respectfully submitted that both of the alleged violations, even assuming the commission's interpretation, involve technical violations neither of which reflect corruption nor the appearance of corruption from large individual financial contributions affecting the Ileana Ros-Lahtinen for Congress campaign.

Looking first to the alleged violation associated with the payments to Sanchez & Levitan Advertising Company for three radio station commercials, one can see this point. As the Commission itself makes clear in the proposed conciliation agreement:

The regulations make an exception to this rule for expenditures for registration or get out the vote drives that do not involve presidential candidates, which need not be attributed to individual candidates unless these expenditures are made on behalf of a clearly identified candidate and the expenditure can be directly attributed to that candidate. (See pg. 2).

The U.S. Supreme Court in Buckley v. Valeo further amplified the concept of "clearly identified". The particular test referred to by the Commission is contained in fn. 51. However, in the main body of the opinion the U.S. Supreme Court also wrote:

"clearly identified" in §608(e)(2) [the former designation] requires that an explicit and unambiguous reference to the candidate appear as part of the communication. 96 S.Ct. at 646.

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It is not our purpose here to debate with the Commission whether or not these particular radio advertisements "clearly identify" Ileana Ros-Lehtinen for Congress and, therefore, that a portion of these expenditures should have been attributed to her. Rather, it is my purpose to point out that this was not an intentional or even a clear violation of the law. Placed in context, it was obviously the intent of the Republican Party of Dade County to come within the exception for GOTV drives that do not involve presidential candidates and which do not "clearly identify" a Federal candidate. In short, it is self evident that it was not the purpose of the Republican Party of Dade to corrupt the election nor did its acts create the appearance of corruption. Rather, this, at best, was a good-faith mistake made by the Party. The difficulty of creating advertisements falling within this exception was severely aggravated by the context of a special election, as opposed to a general election. Rather than impose the severe financial penalty proposed in the conciliation agreement, it is the opinion of the Republican Party of Dade County that an appropriate sanction would be an agreement to refrain from such activities in the future outside the context of certain clearly agreed and specified guidelines. This would educate and promote compliance with the law rather than punish honest mistakes.

Before going further, we think it is important to point out to the Commission in regard to both this violation and the second violation that this committee is a volunteer organization that is not composed of professional politicians. We think in interpreting and implementing the Act it needs to be recognized that its goal is to encourage a broad base of political activities by non-professionals and to discourage the domination of the political process by big money professionals. Thus, imposing severe sanctions for technical violations of the rules by admitted non-professionals can only have the effect of subverting the very purpose for which the Act is intended.

Looking at the second alleged violation only reinforces this belief. There, approximately \$4,747.74 in payments were allegedly made for the purpose of campaign brochures, bumper stickers and fans by the Republican Party of Dade County. As set forth in the conciliation agreement, there is no question these were legally permissible expenditures. It in no way involved any effort to corrupt the process nor do they create the appearance of corrupting the process. Rather, the sole sin of the Republican Party of Dade

Lawrence M. Nobel, Esq.
January 6, 1992
Page 4

County was they reported these expenditures as "coordinated party expenditures rather than as operating expenditures."

Again, it is not our intent to reargue the merits of the alleged violations. Rather, it would appear that a more appropriate sanction would be to order the Republican Party of Dade County to file amended reports showing the expenditures properly categorized as operating expenditures rather than as coordinated party expenditures. Perhaps an additional agreement not to violate the section in the future. Imposition of a substantial financial penalty serves no useful purpose. The individuals that were in charge of the Republican Party of Dade County at the time of the alleged violations are no longer even there. The alleged sins of one group of volunteers is being imposed upon a successor group of volunteers in a way that will neither promote the purposes of the Act nor punish the alleged wrongdoers.

This brings us to the second main issue I would like to address. Over the last four years the Republican Party of Dade County has gone through three chairmen and four treasurers. This has resulted in unprecedented administrative turmoil that has made it extremely difficult to build up and maintain the type of expertise required to comply with all the technical requirements reflected in this MUR. In addition, it has had a severe impact upon the Party's ability to raise money.

92040395219

Lawrence M. Nobel, Esq.
January 6, 1992
Page 5

We hope that the Commission will bear in mind the law was designed to reflect:

...Congress' valid interest in encouraging citizen participation in political campaigns..."
96 S.Ct. at 643.

Please feel free to contact me to discuss these proposed changes. We appreciated this opportunity to address this issue.

Very truly yours,



ANDREW E. GRIGSBY

AEG:ad

cc: Mary Ellen Miller, Chairman
Ernesto Martinez, Treasurer

92040395220

ZUCKERMAN, SPAEDER, TAYLOR & ASSOCIATES

ATTORNEYS AT LAW

201 SOUTH BISCAYNE BOULEVARD
SUITE 800
MIAMI, FLORIDA 33131
(305) 578-0110

TELEPHONE
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(813) 281-1010

FOUR LAUDERDALE OFFICE
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FOUR LAUDERDALE, FLORIDA 33304
(305) 828-0631

WASHINGTON, D.C. OFFICE
1201 CONNECTICUT AVENUE, N.W.
WASHINGTON, D.C. 20036
(202) 778-1800

MARYLAND OFFICE
300 EAST LOMBARD STREET
BALTIMORE, MARYLAND 21202
(301) 338-0444

January 7, 1992

MARY LOUISE ANDRUS
RODNEY S. TALK
DAVID A. ROBERSON
LESLIE M. BERGER
BLAIR G. BRIDGES
ROBERT R. RICH
ROBERT W. CLARK
ROBERT M. CLARK
ROBERTA KRAMER HANSEN
GABRIEL J. JOHNSON
GARY D. WHEELER
ANDREW MARK GRANGE
BARBARA L. WARD
LOUISE A. STOWELL
JULIE A. HARR
THOMAS S. HANSON
MARTIN W. LESTER
BRUCE ANDERSON JAMES
RICHARD S. ROSENBLATT
ELEANOR H. SMITH
ELLEN FISHER MILLS
ALAN H. SCHWENGER

RESIDENT IN MARYLAND
HERBERT BETTER
DONALD J. MCCARTNEY
MELISSA HASKINSLEY CLARK
CYRIL V. SMITH
MARTIN S. HWELES, JR.
JOHN F. EVANS
(301)-868-

RESIDENT IN FLORIDA
RONALD S. RAVENHILL
MICHAEL S. REBAND
ROBERTO MARTINEZ
MORRIS WEINBERG, JR.
JOHN F. LAUREN
HUNBERTO J. PERAZA
GUY A. RAGGIO
BRYAN R. CLEVELAND
SHARON L. KEGGERSIS
FREDERICK W. BALL

RESIDENT IN WASHINGTON, D.C.

ROSEN E. ZUCKERMAN
MARK W. FOSTER
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BRUCE GOLDBSTEIN
WILLIAM W. TAYLOR, III
PETER R. KOLNER
JANEY M. WEISBURGER
STEPHEN M. GLICKMAN
LAWRENCE A. RAYE
MICHAEL R. SMITH
ANTHONY THOMPSON
NELSON C. COHEN
STEVEN M. SALKY
LEONARD C. BERNOWITZ
JUDITH STURTE MARD
ERIC P. FACER

* ALSO ADMITTED IN DISTRICT OF COLUMBIA
* NEW ADMITTED IN FLORIDA

VIA TELEFAX

Lawrence M. Noble, General
Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Re: MUR and 3054

Dear Mr. Noble:

The response to MUR 3054 was prepared by Andrew E. Grigsby, the current counsel to the RPDC, and is incorporated herein as if submitted by the undersigned as a designated counsel of the RPDC authorized to appear before the Commission.

We look forward to hearing from you.

Sincerely,

Roberto Martinez
Roberto Martinez, Esq.

RM/ae

cc: Mary Ellen Miller, Chairman
Ernesto Martinez, Treasurer

92040895221

4020

RECEIVED
FEDERAL ELECTION COMMISSION
MAIL ROOM

92 JAN -8 AM 10:19

MUR
3054



HOUSE OF REPRESENTATIVES

ILEANA ROS-LEHTINEN

P.O. Box 52-278
Miami, FL 33152-2782

January 8, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
JAN -8 PM 3:30

Mr. Lawrence M. Noble
General Counsel
Federal Election Commission
999 E Street NW
Washington, DC 20463

Dear Mr. Noble:

92040895222

Throughout the special election campaigns of 1989, the Committee operated in the belief that its Treasurer, Richard P. Tonkinson, was fulfilling all necessary obligations of his position as campaign Treasurer, including filing all FEC reports required.

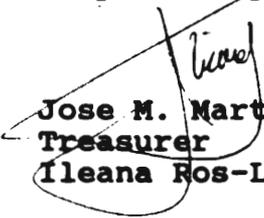
Upon learning that all obligations had not been fulfilled, including those cited in MUR 3054, the Committee took the strongest measure possible in removing Mr. Tonkinson from the position of Treasurer. This action was taken despite the fact that the Committee knew that a difficult re-election campaign lay ahead in just a few months, rather than following the customary two year interval.

Mr. Lawrence M. Noble
Page Two

It is true that the Republican Party of Dade County has status that prohibits its ability to make independent expenditures on behalf of Republican candidates. However, in all other aspects, these ads qualify under the Commission's definition of independent expenditures. In this regard, we feel that no purpose is served by penalizing the Committee for a situation over which it had absolutely no control.

9 2 0 4 0 8 9 5 2 2 3

Respectfully submitted:


Jose M. Martinez-Armesto
Treasurer
Ileana Ros-Lehtinen for Congress

REPUBLICAN PARTY OF DADE COUNTY
FEDERAL ACCOUNT

138

PAY TO THE
ORDER OF

Federal Election Commission
February 14 1972
\$ 250.00

Two Hundred Fifty ----- DOLLARS

 Southeast Bank, N.A.
COMMERCIAL BANKING COMPANY
THE PEOPLE'S CHOICE BANK
CORP. CHARTERED IN FLORIDA

FOR HUR 3054 018 672500

Wally Dean Green
Trustee

9 2 0 4 0 8 9 5 2 2 4

9 2 0 4 0 8 9 5 2 2 5

0349

63 60 (4) 1 040

February 10, 92

\$ 4000.00

ILEANA ROS-LEHTINEN
FOR CONGRESS - 1992
P.O. BOX 52-2784
MIAMI, FL 33152-2784

PAY TO THE ORDER OF: United States Treasury

Four thousand and no/100s



FEC MUR 3054

⑆066000604⑆0602001009749⑆ 0349

92 FEB 19 PHIL: 14

PHILIP

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
FEB 24 1992
FEB 24 12:03

In the Matter of

Ileana Ros-Lehtinen for Congress)
Committee and Jose M.)
Martinez-Armesto, as treasurer)

MUR 3054

SENSITIVE

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement which has been signed by Jose M. Martinez-Armesto, the treasurer of the Ileana Ros-Lehtinen for Congress Committee.

A

check for the civil penalty has not been received. The Office of the General Counsel recommends that the Commission accept the attached conciliation agreement and close the file as to this respondent.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer.
2. Close the file as to this respondent.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

2/21/92
Date

BY: 
Lois G. Lerner
Associate General Counsel

Attachment
Conciliation Agreement

Staff Assigned: Jeffrey Long

92040895226

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Ileana Ros-Lehtinen for Congress) MUR 3054
Committee and Jose M. Martinez-Armesto,)
as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on February 26, 1992, the Commission decided by a vote of 5-0 to take the following actions in MUR 3054:

1. Accept the conciliation agreement with the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, as recommended in the General Counsel's Report dated February 21, 1992.
2. Close the file as to this respondent.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated February 21, 1992.

Commissioners Aikens, Elliott, McDonald, McGarry, and Thomas voted affirmatively for the decision; Commissioner Potter did not cast a vote.

Attest:

2-27-92
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat:	Mon., Feb. 24, 1992 12:09 p.m.
Circulated to the Commission:	Mon., Feb. 24, 1992 4:00 p.m.
Deadline for vote:	Wed., Feb. 26, 1992 4:00 p.m.

92040895227

92 FEB 13 PM 1:30

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
 Ileana Ros-Lehtinen for Congress) MUR 3054
 Committee and Jose M.)
 Martinez-Armesto, as treasurer)

92 FEB 19 PM 11:54

FEDERAL ELECTION COMMISSION

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Ileana Ros-Lehtinen for Congress Committee and Jose M. Martinez-Armesto, as treasurer, ("Respondents") violated 2 U.S.C. §§ 434(a)(6) and 441a(f).

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. Ileana Ros-Lehtinen for Congress Committee is a political committee within the meaning of 2 U.S.C. § 431(4) and the principal campaign committee of Ileana Ros-Lehtinen, the Republican candidate, for the special primary and special general elections for the U.S. House of Representatives in the Eighteenth

92040895228

Congressional District of Florida in 1989 within the meaning of 2 U.S.C. § 431(5). The special primary election was August 1, 1989, and the special general election was August 29, 1989.

2. Jose M. Martinez-Armesto is the treasurer of the Ileana Ros-Lehtinen for Congress Committee. Richard Preston Tonkinson was the treasurer at the time of the 1989 special elections.

3. The Republican Party of Dade County is a political committee and local party committee within the meaning of 2 U.S.C. § 431(4)(C) and a multicandidate political committee within the meaning of 2 U.S.C. § 441a(a)(4).

4. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that any person may contribute an aggregate of \$1,000 with respect to any election to a candidate for federal office and that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. §§ 441a(a)(1)(A) and 441a(a)(2)(A). A political committee may not knowingly accept a contribution in excess of these limitations. 2 U.S.C. § 441a(f). Commission regulations provide methods and time frames for refunds, redesignations, and reattributions for contributions that would otherwise be excessive. 11 C.F.R. §§ 103.3(b) and 110.1 and 110.2. Political party committees are incapable of making independent expenditures on behalf of their candidates. 11 C.F.R. § 110.7(b)(4).

5. Commission regulations further provide that expenditures on behalf of more than one candidate shall be

92040895229

attributed to each candidate in proportion to, and shall be reported to reflect, the benefit reasonably expected to be derived. 11 C.F.R. § 106.1(a). The regulations make an exception to this rule for expenditures for registration or get-out-the-vote drives that do not involve presidential candidates, which need not be attributed to individual candidates unless these expenditures are made on behalf of a clearly identified candidate and the expenditure can be directly attributed to that candidate. 11 C.F.R. § 106.1(c)(2); compare with 11 C.F.R. § 100.7(b)(17).

6. The Act and regulations define "clearly identified" to mean the name of the candidate appears, a photograph or drawing of the candidate appears, or "the identity of the candidate is apparent by unambiguous reference." 2 U.S.C. § 431(18) and 11 C.F.R. § 106.1(d). The United States Supreme Court has further stated that "clearly identified" would include references to the candidate's office, such as President or Governor, and to the candidate's status as a candidate, such as "the senatorial candidate of the Republican Party of Georgia." Buckley v. Valeo, 424 U.S. 1, 44 n.51 (1976).

7. The Act provides that the principal campaign committee of a candidate shall file notifications of any contribution or \$1,000 or more received by any authorized committee after the 20th day but more than 48 hours before any election. This notification shall be filed within 48 hours after the receipt of such contribution and shall include the name of the candidate and the office sought, the identification of the

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contributor, and the date of receipt and amount of the contribution. 2 U.S.C. § 434(a)(6)(A). This notification shall be in addition to all other reporting requirements under the Act. 2 U.S.C. § 434(a)(6)(B). The Act defines "identification" to mean in the case of any individual, the name, the mailing address, and the occupation of each individual as well as the name of his or her employer and in the case of any other person, the full name and mailing address. 2 U.S.C. § 431(13).

8. The Republican Party of Dade County made a contribution of \$5,000 to the Ileana Ros-Lehtinen for Congress Committee on August 11, 1989, with respect to the special general election.

9. The Republican Party of Dade County reported \$8,800 in payments to Sanchez & Levitan Advertising Co. on August 25, 1989, and three radio stations on August 24, 1989, for get-out-the-vote radio advertisements. A translation of the scripts for these radio advertisements shows that the advertisements urged listeners to vote for the Republican candidates for Congress and the state legislature in the special general election. The principal passages read:

Secure the election of Republican candidates to the Federal Congress as well as the senate and state legislature. They represent your values and your concerns.

....

On Tuesday, August 29th, your future and that of your family is at hand. Vote for the Republican candidates, in order to secure that your values are well represented.

....

[This is] Alberto Cardenas speaking to you. On Tuesday, August 29th, there are elections for the Federal Congress, the senate, and the state legislature. ... Vote for your Republican candidates.

9 2 0 4 0 8 9 5 2 3 1

These references to the Republican candidate for Congress in the August 29 special general election made the identity of Ileana Ros-Lehtinen apparent by an unambiguous reference and, thus, sufficed to clearly identify her. With three offices on the ballot, the costs of these advertisements should have been allocated at least one third to the candidacy of Ileana Ros-Lehtinen and two thirds to the state candidates, resulting in an additional contribution from the Republican Party of Dade County of \$2,734. Respondents contend that the Committee had no control over these ads and that they were broadcast without the knowledge or cooperation of the Committee or the candidate.

10. Three individuals made excessive contributions to the Ileana Ros-Lehtinen for Congress Committee with respect to the 1989 special general election. These contributions are those made by Frederick W. Guardabassi (\$500 in excessive contributions), Alma E. Morissette (\$1,000 in excessive contributions), and Fernando Rodriguez (\$300 in excessive contributions). These contributors made their contributions after the special primary election and before the special general election that in the aggregate exceeded their limitations with respect to the special general election. The Ileana Ros-Lehtinen for Congress Committee refunded the excessive portions of these contributions on May 31, 1990. These refunds were not made within 60 days of the receipt of the contributions as required by 11 C.F.R. § 103.3(b). Respondents contend that the refunds were

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made "without delay as soon as the Committee became aware that they were necessary."

11. The reports filed by the Ileana Ros-Lehtinen for Congress Committee disclose 25 contributions totaling \$29,000 that were received between the 20th day but more than 48 hours prior to the special general election. These contributions were received on the following dates and in the indicated aggregate amounts on those dates:

Date Received	Aggregate Amount
August 11th	\$7,000
August 16th	4,000
August 17th	2,000
August 21st	1,000
August 25th	<u>15,000</u>
Total	\$29,000

These contributions were not reported within 48 hours of their receipt as required by 2 U.S.C. § 434(a)(6).

V. 1. The Respondents accepted \$2,734 in excessive contributions from the Republican Party of Dade County and \$1,800 in excessive contributions from three individuals, in violation of 2 U.S.C. § 441a(f).

2. The Respondents failed to file 48 hour reports for 25 contributions totaling \$29,000, in violation of 2 U.S.C. § 434(a)(6).

VI. Respondents will pay a civil penalty to the Federal Election Commission in the amount of four thousand dollars (\$4,000.00), pursuant to 2 U.S.C. § 437g(a)(5)(A).

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

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herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY:

Lois G. Lerner
Associate General Counsel

Date

3/2/92

FOR THE RESPONDENTS:

(Name)

(Position)

Treasurer

Date

2/7/92

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Long



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 3, 1992

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2784
Miami, Florida 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as treasurer

Dear Mr. Martinez-Armesto:

On February 26, 1992, the Federal Election Commission accepted the signed conciliation agreement and civil penalty submitted on your behalf in settlement of a violation of 2 U.S.C. §§ 434(a)(6) and 441a(f), provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter as it pertains to Ileana Ros-Lehtinen for Congress and you, as treasurer.

This matter will become a part of the public record within 30 days after it has been closed with respect to all other respondents involved. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

The Commission reminds you that the confidentiality provisions of 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed. In the event you wish to waive confidentiality under 2 U.S.C. § 437g(a)(12)(A), written notice of the waiver must be submitted to the Commission. Receipt of the waiver will be acknowledged in writing by the Commission.

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Jose M. Martinez-Armesto, Treasurer
Page 2

Enclosed you will find a copy of the fully executed
conciliation agreement for your files. If you have any questions,
please contact me at (202) 219-3690.

Sincerely,



Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED

F.E.C.

92 MAR -2 PM 4:48

MUR 3054

SENSITIVE

In the Matter of)
Republican Party of Dade County)
and Ernesto Martinez, as treasurer)

GENERAL COUNSEL'S REPORT

I. BACKGROUND

Attached is a conciliation agreement signed by Ernesto Martinez, the treasurer of the Republican Party of Dade County.

A check for the first installment of the civil penalty has been received. Additionally, a check for the full amount of the civil penalty was recently received from the Ileana Ros-Lehtinen Committee, the other respondent in this matter. See General Counsel's Report signed February 21, 1992. The Office of the General Counsel recommends that the Commission accept the attached conciliation agreement and close the file.

II. RECOMMENDATIONS

1. Accept the attached conciliation agreement with the Republican Party of Dade County and Ernesto Martinez, as treasurer.
2. Close the file.
3. Approve the appropriate letter.

Lawrence M. Noble
General Counsel

Date 3/2/92

BY: 
Lois G. Lerner
Associate General Counsel

Attachments

1. Conciliation Agreement
2. Civil Penalty Checks (2)

Staff Assigned: Jeffrey Long

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Republican Party of Dade County) MUR 3054
and Ernesto Martinez, as treasurer.)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 5, 1992, the Commission decided by a vote of 5-0 to take the following actions in MUR 3054:

1. Accept the conciliation agreement with the Republican Party of Dade County and Ernesto Martinez, as treasurer, as recommended in the General Counsel's Report dated March 2, 1992.
2. Close the file.
3. Approve the appropriate letter, as recommended in the General Counsel's Report dated March 2, 1992.

Commissioners Aikens, Elliott, McGarry, Potter, and Thomas voted affirmatively for the decision; Commissioner McDonald did not cast a vote.

Attest:

3-5-92
Date

Marjorie W. Emmons
Marjorie W. Emmons
Secretary of the Commission

Received in the Secretariat: Mon., Mar. 02, 1992 4:48 p.m.
Circulated to the Commission: Tues., Mar. 03, 1992 11:00 a.m.
Deadline for vote: Thurs., Mar. 05, 1992 11:00 a.m.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 12, 1992

Jose M. Martinez-Armesto, Treasurer
Ileana Ros-Lehtinen for Congress
P.O. Box 52-2784
Miami, Florida 33152-2784

RE: MUR 3054
Ileana Ros-Lehtinen for
Congress and Jose M.
Martinez-Armesto, as treasurer

Dear Mr. Martinez-Armesto:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeffrey D. Long".

Jeffrey D. Long
Paralegal

92040895239



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 12, 1992

Benjamin L. Ginsberg, Esquire
Republican National Committee
310 First Street, Southeast
Washington, D.C. 20003

RE: MUR 3054
Republican National Committee
and William J. McManus, as
treasurer

Dear Mr. Ginsberg:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeffrey D. Long".

Jeffrey D. Long
Paralegal

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 12, 1992

Jan W. Baran, Esquire
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20008

MUR 3054
Republican Party of Florida
and Shirlee Bowne, as treasurer

National Republican Congressional
Committee and Jack McDonald, as
treasurer

Dear Mr. Baran:

This is to advise you that the entire file in this matter has now been closed and will become part of the public record within 30 days. Should you wish to submit any legal or factual materials to be placed on the public record in connection with this matter, please do so within ten days. Such materials should be sent to the Office of the General Counsel.

Should you have any questions, contact me at (202) 219-3690.

Sincerely,

A handwritten signature in cursive script, appearing to read "Jeffrey D. Long".

Jeffrey D. Long
Paralegal

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

March 12, 1992

Roberto Martinez, Esquire
Zuckerman, Spaeder, Taylor & Evans
201 South Biscayne Boulevard
Miami, Florida 33131

RE: MUR 3054
Republican Party of Dade County
and Ernesto Martinez, as treasurer

Dear Mr. Martinez:

On March 5, 1992, the Federal Election Commission accepted the signed conciliation agreement submitted on your client's behalf in settlement of a violation of 2 U.S.C. §§ 434(b) and 441a, provisions of the Federal Election Campaign Act of 1971, as amended. Accordingly, the file has been closed in this matter.

This matter will become a part of the public record within 30 days. If you wish to submit any factual or legal materials to appear on the public record, please do so within ten days. Such materials should be sent to the Office of the General Counsel. Please be advised that information derived in connection with any conciliation attempt will not become public without the written consent of the respondent and the Commission. See 2 U.S.C. § 437g(a)(4)(B). The enclosed conciliation agreement, however, will become a part of the public record.

Enclosed you will find a copy of the fully executed conciliation agreement for your files. Please note that the next installment payment of the civil penalty is due within 60 days of the conciliation agreement's effective date. If you have any questions, please contact me at (202) 219-5690.

Sincerely,

Jeffrey D. Long
Paralegal

Enclosure
Conciliation Agreement

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Republican Party of Dade County) MUR 3054
and Ernesto Martinez, as)
treasurer)

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission ("Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities. The Commission found probable cause to believe that the Republican Party of Dade County and its treasurer ("Respondents") violated 2 U.S.C. §§ 434(b) and 441a.

NOW, THEREFORE, the Commission and the Respondents, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i), do hereby agree as follows:

I. The Commission has jurisdiction over the Respondents and the subject matter of this proceeding.

II. Respondents have had a reasonable opportunity to demonstrate that no action should be taken in this matter.

III. Respondents enter voluntarily into this agreement with the Commission.

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

1. The Republican Party of Dade County is a political committee and local party committee within the meaning of 2 U.S.C. § 431(4)(C) and a multicandidate political committee within the meaning of 2 U.S.C. § 441a(a)(4).

2. David W. Southwell was the treasurer of the Republican Party of Dade County. Luis Arrizurieta succeeded

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David W. Southwell on March 28, 1991. Ernesto Martinez succeeded Luis Arrizurieta on October 24, 1991.

3. The Ileana Ros-Lehtinen for Congress Committee is the principal campaign committee for Ileana Ros-Lehtinen, the Republican candidate for election to the U.S. House of Representatives in the special elections in 1989 in the Eighteenth Congressional District of Florida. The special primary election was held on August 1, 1989, and the special general election on August 29, 1989.

4. The Federal Election Campaign Act of 1971, as amended ("the Act"), provides that a multicandidate political committee may contribute an aggregate of \$5,000 with respect to any election to a candidate for federal office. 2 U.S.C. § 441a(a)(2)(A). Political party committees are incapable of making independent expenditures on behalf of their candidates. 11 C.F.R. § 110.7(b)(4).

5. Commission regulations further provide that expenditures on behalf of more than one candidate shall be attributed to each candidate in proportion to, and shall be reported to reflect, the benefit reasonably expected to be derived. 11 C.F.R. § 106.1(a). The regulations make an exception to this rule for expenditures for registration or get-out-the-vote drives that do not involve presidential candidates, which need not be attributed to individual candidates unless these expenditures are made on behalf of a clearly identified candidate and the expenditure can be directly

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attributed to that candidate. 11 C.F.R. § 106.1(c)(2); compare with 11 C.F.R. § 100.7(b)(17).

6. The Act and regulations define "clearly identified" to mean the name of the candidate appears, a photograph or drawing of the candidate appears, or "the identity of the candidate is apparent by unambiguous reference." 2 U.S.C. § 431(18) and 11 C.F.R. § 106.1(d). The United States Supreme Court has further stated that "clearly identified" would include references to the candidate's office, such as President or Governor, and to the candidate's status as a candidate, such as "the senatorial candidate of the Republican Party of Georgia." Buckley v. Valeo, 424 U.S. 1, 44 n.51 (1976).

7. The Act gives special expenditure authority to the national committee of a political party and the state committee of a political party with respect to elections for the House of Representatives and the United States Senate. 2 U.S.C. § 441a(d)(3). The coordinated party expenditure limitation with respect to the 1989 special general election was \$23,990 each for the Republican Party of Florida and the Republican National Committee ("RNC"). The Commission has recognized that these committees may make such expenditures through any designated agent including other party committees.

8. The Act and regulations specifically permit a local party committee to make payments in connection with volunteer activity for campaign materials, such as pins, bumper stickers, brochures, and handbills, subject to certain requirements without the payments being considered a contribution or expenditure under

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the Act. 2 U.S.C. §§ 431(8)(B)(x) and 431(9)(B)(viii). Such payments are reported as disbursements and need not be allocated to any specific candidate. 11 C.F.R. §§ 100.7(b)(15)(v) and 100.8(b)(16)(v).

9. The Republican Party of Dade County made a contribution of \$5,000 to the Ileana Ros-Lehtinen for Congress Committee on August 11, 1989, with respect to the special general election.

10. The Republican Party of Dade County reported \$8,800 in payments to Sanchez & Levitan Advertising Co. on August 25, 1989, and three radio stations on August 24, 1989, for get-out-the-vote radio advertisements. A translation of the scripts for these radio advertisements shows that the advertisements urged listeners to vote for the Republican candidates for Congress and the state legislature in the special general election. The principal passages read:

Secure the election of Republican candidates to the Federal Congress as well as the senate and state legislature. They represent your values and your concerns.

....
On Tuesday, August 29th, your future and that of your family is at hand. Vote for the Republican candidates, in order to secure that your values are well represented.

....
[This is] Alberto Cardenas speaking to you. On Tuesday, August 29th, there are elections for the Federal Congress, the senate, and the state legislature. ...
Vote for your Republican candidates.

These references to the Republican candidate for Congress in the August 29 special general election made the identity of Ileana Ros-Lehtinen apparent by an unambiguous reference and, thus,

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sufficed to clearly identify her. With three offices on the ballot, the costs of these advertisements should have been allocated at least one third to the candidacy of Ileana Ros-Lehtinen and two thirds to the state candidates, resulting in an additional contribution from the Republican Party of Dade County of \$2,734.

11. The Republican Party of Florida and the Republican National Committee ("RNC") authorized the National Republican Congressional Committee ("NRCC") to utilize their coordinated party expenditure limitations on behalf of Ileana Ros-Lehtinen. The NRCC reported making \$47,836 in coordinated party expenditures on behalf of Ileana Ros-Lehtinen. The treasurer of the RNC has stated in an affidavit that the RNC "had no record of any authorization to the Republican Party of Dade County to make §441a(d) expenditures." The Republican Party of Dade County reported making coordinated party expenditures on behalf of Ileana Ros-Lehtinen in the amount of \$4,747.74. These expenditures were made to Dodd Printers of Hialeah in two payments on August 25, 1989, of \$3,799.04 and \$948.70 for a campaign brochure, bumper stickers, and fans which clearly identified Ileana Ros-Lehtinen. During the period from July 1 to September 18, 1989, the Republican Party of Dade County reported no payments for postage, mailings, or mailing lists. Therefore, the \$4,747.74 in payments to Dodd Printers qualify as exempt payments, rather than coordinated party expenditures, and the Republican Party of Dade County should have reported them as operating expenditures.

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V. 1. Respondents made excessive contributions of \$2,734 to or on behalf of the Ileana Ros-Lehtinen for Congress Committee, in violation of 2 U.S.C. § 441a.

2. Respondents misreported exempt payments of \$4,747.74 as coordinated party expenditures on behalf of the candidacy of Ileana Ros-Lehtinen, in violation of 2 U.S.C. § 434(b).

3. Respondents contend that the violations were not knowing and willful.

VI. 1. Respondents will pay a civil penalty to the Federal Election Commission in the amount of one thousand dollars (\$1,000.00), pursuant to 2 U.S.C. § 437g(a)(5)(A), such penalty to be paid as follows:

a. One initial payment of \$250 due 30 days after receipt of a fully executed agreement;

b. Thereafter, beginning 60 days after receipt of the fully executed agreement, three (3) consecutive monthly installment payments of \$250 each;

c. In the event that any installment payment is not received by the Commission by the fifth day of the month in which it becomes due, the Commission may, at its discretion, accelerate the remaining payments and cause the entire amount to become due upon ten days written notice to the respondents. Failure by the Commission to accelerate the payments with regard to any overdue installment shall not be construed as a waiver of its right to do so with regard to future overdue installments.

2. Respondents will amend its reports to disclose the

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\$4,747.74 in payments for campaign material in conjunction with the 1989 special election as operating expenditures.

3. Respondents will report payments as coordinated party expenditures on behalf of federal candidates only if explicitly authorized in writing by the Republican National Committee or the Republican Party of Florida to make such expenditures against the authorizing committee's statutory limitation.

VII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

VIII. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

IX. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

X. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or

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oral, made by either party or by agents of either party, that is not contained in this written agreement shall be enforceable.

FOR THE COMMISSION:

Lawrence M. Noble
General Counsel

BY: *[Signature]*
Lois G. Lerner
Associate General Counsel

Date 3-11-92

FOR THE RESPONDENTS:

[Signature]
(Name)
(Position)
TREASURY

Date FEBRUARY 14/1992

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THIS IS THE END OF MUR # 3054

DATE FILMED _____ CAMERA NO. _____

CAMERAMAN _____

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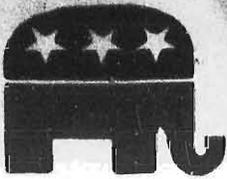


FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 3054.

6/10/92

92040910035



Republican Party of Dade County

2905 Salsedo Street • Coral Gables, Florida 33134 • (305) 443-1676 • (305) 445-2965 Fax

CLOSED

April 10, 1992

92 APR 20 AM 11:44

RECEIVED
FEDERAL ELECTION COMMISSION

Jeffrey D. Long, Paralegal
Federal Election Commission
Washington, D.C. 20463

RE: MUR 3054
Republican Party of Dade County

Dear Mr. Long:

Enclosed our check for \$250.00 for the payment due April 14th in settlement of subject matter.

Our records reflect that the next \$250.00 payment will be due on June 14th and the final \$250.00 payment will be due on August 14th. Please advise, only if this is incorrect.

Sincerely,

Mary Ellen Miller
Chairman

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RECEIVED
FEDERAL ELECTION
COMMISSION
MAIL ROOM

OGC 4746



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 17, 1992

92 APR 20 AM 11:32

RECEIVED
FEDERAL ELECTION COMMISSION

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Republican Party of Dade County, check number 144, dated 4-10-92, and in the amount of \$250.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of \$ 250.00, the MUR number is 3054 and in the name of Republican Party of Dade County. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Virginia Whitted
Signature

April 17, 1992
Date

22040710037

REPUBLICAN PARTY OF DADE COUNTY
FEDERAL ACCOUNT

141

4-10 1992

PAY TO THE
ORDER OF

Federal Election Commission

\$ 250.00

Two Hundred, Fifty & 00/100

DOLLARS

Southeast Bank, N.A.
CORAL GABLES BRANCH CENTER
2188 PONCE DE LEON BOULEVARD
CORAL GABLES, FL 33134

Mary Ellen Muesel

FOR *MUR-3854*

Ernesto Martinez

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818 677500⑆

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92 APR 20 AM 11:44

RECEIVED
FEDERAL ELECTION COMMISSION



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

THE FOLLOWING DOCUMENTATION IS ADDED TO

THE PUBLIC RECORD IN CLOSED MUR 3054 .

6/24/92

92040910164



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CLOSED

Folder Copy

June 9, 1992

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM
92 JUN -9 PM 3:28

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks *PB*
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Republican Party of DaDe Federal Act, check number 144, dated June 3, 1992, and in the amount of \$ 250.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

* No Correspondence

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of \$ 250.00, the MUR number is 3054 and in the name of REPUBLICAN PARTY OF DADE COUNTY. The account into which it should be deposited is indicated below:

- XX Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Virginia Whitted
Signature

June 9, 1992
Date

92040910165

REPUBLICAN PARTY OF DADE COUNTY
FEDERAL ACCOUNT

RECEIVED
FEDERAL ELECTION COMMISSION
MAIN COPY ROOM

144

92 JUN -9 PM 3:27 19 92

PAY TO THE
ORDER OF

Federal Election Commission

\$ 250.00

Two Hundred Fifty & 00/100

DOLLARS

 Southeast Bank, N.A.
CORAL GABLES BRANCH CENTER
2800 Ponce de Leon Boulevard
CORAL GABLES, FL 33134

Mary Ellen Meenan

FOR *MUR #3054 - 3rd payment*

E. Ernesto Martinez Jr.

⑆000144⑆ ⑆06600058⑆

018 677500⑆

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FEDERAL ELECTION COMMISSION
WASHINGTON, D C 20463

Microfilm
 Public Records
 Press

THE FOLLOWING DOCUMENTATION IS ADDED TO
THE PUBLIC RECORD IN CLOSED MUR 3054.

8/31/92

92040923933

Folder Copy



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 17, 1992

TWO WAY MEMORANDUM

TO: Virginia Whitted
OGC, Docket

FROM: Philomena Brooks
Accounting Technician

SUBJECT: Account Determination for Funds Received

We recently received a check from Republican Party of Dade County Federal Account, check number 155, dated August 13, 1992, and in the amount of \$ 250.00. Attached is a copy of the check and any correspondence that was forwarded. Please indicate below the account into which it should be deposited, and the MUR number and name.

TO: Philomena Brooks
Accounting Technician

FROM: Virginia Whitted
OGC, Docket

In reference to the above check in the amount of \$ 250.00, the MUR number is 3054 and in the name of Republican Party of Dade County. The account into which it should be deposited is indicated below:

- Budget Clearing Account (OGC), 95F3875.16
- Civil Penalties Account, 95-1099.160
- Other: _____

Virginia Whitted
Signature

August 18, 1992
Date

92040923934

REPUBLICAN PARTY OF DADE COUNTY
FEDERAL ACCOUNT

155

8.13 1992

PAY TO THE
ORDER OF

Federal Election Commission

\$ 250.00

Two Hundred Fifty & ⁰⁰/₁₀₀

DOLLARS

 Southeast Bank, N.A.
CORAL GABLES BANKING CENTER
2100 PONCE DE LEON BOULEVARD
CORAL GABLES, FL 33134

Raymond M...

Five-MR 3054-4th p 4 payment
June

Ernesto Martinez

⑆000155⑆ ⑆066000581⑆

018 677500⑆

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