FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 603

Date Filmed 4/26/79 Camera No. --- 2

Cameraman SPC

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

March 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
19532 Victory Boulevard
Reseda, California 91335

Re: MUR 603(78)

Dear Mr. Ramos:

Enclosed please find a copy of the signed conciliation agreement entered into by Ramos Graff and Associates and Federal Election Commission.

The file in this matter is now closed.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7904012106 2

603 AW

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:
Salvador M Ramos

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438502	

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE: ☐ Addressee ☐ Authorized agent
Elestiel Ramos

4. DATE OF DELIVERY: 3-26-79

POSTMARK: MAR 26 1979

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO: 1977—0—249-500

7 9 0 4 0 1 2 1 0 6 3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Ramos Graff and Associates) MUR 603(78)

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent, Ramos Graff and Associates, violated 2 U.S.C. § 441a(a)(1)(A):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Ramos Graff and Associates having duly entered into conciliation pursuant to § 437g(a)(5) do hereby agree as follows:

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

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

III. The respondent Ramos Graff and Associates, by absolving candidate Jim Madrid of a $10,937.42 debt not considered in the ordinary course of business, therefore made a $10,937.42 contribution to the campaign.

7904012106 4

Therefore, respondent Ramos Graff and Associates agrees:

I. Respondent's actions in contributing in excess of the limitation is in violation of 2 U.S.C. § 441a(a)(1)(A).

II. Respondent will pay a civil penalty in the amount of $200 pursuant to 2 U.S.C. § 437g(a)(6)(B)(i).

III. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

7904012106 5

III. It is agreed that respondent Ramos Graff and Associates shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

19 MAR 1979
~~18 FEB 1979~~
Date

William C. Oldaker
General Counsel
Federal Election Commission

12/18/78
Date

Salvador M. Ramos
Ramos Graff and Associates

7904012106 6

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

March 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry Aguilar, Sr.
2570 E. Orange Grove
Pasadena, California 91107

Re: MUR 603(78)

Dear Mr. Aguilar:

Enclosed please find a copy of the signed conciliation agreement entered into by yourself and the Federal Election Commission.

The file in this matter is now closed.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7 9 0 4 0 1 2 1 0 5 7

603 Ave

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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Add your address in the "RETURN TO" space on reverse.

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

2. ARTICLE ADDRESSED TO:
Henry Aguilar

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438501	

(Always obtain signature of addressee or agent)

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

4. Mary Aguilar

DATE OF DELIVERY: MAR 1979

POSTMARK: MAR 26 1979 EAST PASADENA

5. ADDRESS (Complete only if requested)
2609 E. Colorado

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO: 1977—0—249-185

7904012106 8

GCC 6022

RECEIVED
FEDERAL ELECTION
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

'79 JAN 2 AM 9:48

In the Matter of)
)
Mr. Henry Aguilar, Sr.) MUR 603(78)

608736

Conciliation Agreement

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable causes to believe that Mr. Henry Aguilar,Sr., (hereinafter "Respondent") has violated 2 U.S.C. § 441g:

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

WHEREFORE, Respondent agrees:

A. That the Respondent made a $1,000 contribution in U.S. currency to Mr. Jim Madrid and the Committee to Elect Jim Madrid.

B. That the making of a contribution in currency to or for the benefit of a candidate for Federal office in excess

7 9 0 4 0 1 2 1 0 6 2

of $100 constitutes a violation of 2 U.S.C. § 441g.

C. That Respondent has therefore violated 2 U.S.C. § 441g.

D. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

IV. General Conditions

A. 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.

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

19 MAR 1979
Date

William C. Oldaker
General Counsel
Federal Election Commission

12/22/78
Date

Henry Aguilar, Sr.

7 9 0 4 0 1 2 1 0 7 0

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

March 19, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Madrid
c/o Compressor Equipment
1933 San Fernado Road
Los Angeles, California 90065

Re: MUR 603(78)

Dear Mr. Madrid:

Enclosed please find a copy of the signed conciliation agreement entered into by yourself on behalf of the Committee to elect Jim Madrid and the Federal Election Commission.

The file in this matter is now closed.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7904012107 1

603 AW

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:
James Madrid

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	936500	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
3/23/79

POSTMARK
MAR 23 1979

5. ADDRESS (Complete only if requested)
1933 N. Fairfax Rd
L.A. CA 90015

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO: 1977—0—249-595

7904012107 2

Weinstein

GCC 9443

FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

'79 FEB 26 PM 2:43

In the Matter of)
) MUR 603(78)
Committee to Elect Jim Madrid)

901035

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent Committee to Elect Jim Madrid, violated 2 U.S.C. § 441a(f):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Committee to Elect Jim Madrid having duly entered into conciliation pursuant to § 437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has juridiction over respondent and the subject of this proceeding.

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

III. The respondent, Committee to Elect Jim Madrid, accepted a $10,937.43 contribution.

Therefore, respondent Committee to Elect Jim Madrid agrees:

I. Respondent's action in accepting a contribution in excess of the limit of $1000 per election is in violation of 2 U.S.C. § 441a(f).

79040121073

II. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

3/16/79
Date

William C. Oldaker
General Counsel
Federal Election Commission

7-23-79.
Date

James Madrid
on behalf of
The Committee to Elect
Jim Madrid

79040121071

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 603 (78)
Committee to Elect Jim Madrid	)	
Ramos Graff and Associates	)	
Henry Aguilar, Sr.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on March 14, 1979, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated March 8, 1979, regarding the above-captioned matter:

1. Accept the signed conciliation agreements attached to this report.
2. Send the letters attached to the above-named report.
3. Close the file in this matter.

Voting for this determination were Commissioners Aikens, Tiernan, McGarry, Thomson, and Harrks.

Attest:

3/15/79
Date

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

Received in Office of Commission Secretary: Friday, March 9, 1979, 2:37

Circulated on 48 hour vote basis: Monday, March 12, 1979, 4:30

7904012107 5

March 9, 1979

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 603

Please have the attached General Counsel's Report on MUR 603 distributed to the Commission on a 48 hour tally basis.

Thank you.

7904012107 5

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

'9 MAR 9 P2: 37

In the Matter of	)	
	)	
Committee to Elect Jim Madrid	)	MUR 603(78)
Ramos Graff and Associates	)	
Henry Aguilar, Sr.	)	

General Counsel's Report

On September 20, 1978, the Commission found reasonable cause to believe that the Committee to Elect Jim Madrid ("the Committee") and Ramos Graff and Associates had violated 2 U.S.C. 441a(f) and 2 U.S.C. §441a(a)(A) respectively by receiving and making excessive contributions by virtue of the forgiveness of $10,937.42 in debts owed Ramos Graff by the Committee. On December 13, 1978, the Commission found reasonable cause to believe that Mr. Henry Aguilar, Sr., had violated 2 U.S.C. §441g by making an excessive cash contribution to the Committee.

The proposed conciliation agreements originally approved by the Commission and sent to Mr. Aguilar and Ramos Graff and Associates have been signed and returned, the latter under protest. Salvador Ramos has also submitted $200 in payment of the civil penalty provided in the Ramos Graff agreement. (See Attachments I,II,III,).

The conciliation agreement signed by Mr. Madrid on behalf of the Committee is a modification of the proposed agreement first sent to the Committee. (See Attachment IV). Mr. Madrid has asserted throughout the conciliation period that Ramos Graff and Associates had served in fact as his campaign committee and that he should not be charged personally for

7904012107 7

the consequences of the acts of that organization. Ramos and Graff claims that it was hired to provide certain services for Mr. Madrid's campaign and expected payment. Mr. Madrid claims in turn that Ramos Graff approached him about running for office and that he never agreed to pay any person or organization. Mr. Madrid's position as to the role of Ramos Graff is supported by statements made by at least one former treasurer of the Committee who wrote to Ramos Graff that he had never handled funds on behalf of the Committee. Rather, Ramos Graff took care of all such matters, at least during the earlier part of the campaign.

Beginning approximately in August of 1976, Ramos Graff and Associates withdrew from the campaign, leaving Mr. Madrid with responsibility for its continuation. Upon the resignation of the second Committee treasurer in December of 1976, Mr. Madrid became the de facto treasurer, ie,he wrote checks, filed reports,etc., even though he was never registered as such.

Given Mr. Madrid's role in the campaign, it is appropriate that he signed the conciliation agreement pertaining to the Committee. He would not, however, have been willing to do this if the civil penalty originally included had not been dropped, again because of his insistance that Ramos Graff was responsible for any wrongdoing.

7904012107 8

We recommend acceptance by the Commission of the revised agreement which Mr. Madrid has signed. The Committee itself has no money with which to pay a civil penalty, and the treasurer at the time Ramos Graff made what are now deemed contributions-in-kind resigned long ago. We believe that it would be very difficult to sustain a finding that Mr. Madrid is personally liable for the Committee's acceptance of Ramos Graff's contributions-in-kind. It should also be noted that Mr. Madrid has cooperated fully with the Commissioner's auditors and with the Office of General Counsel.

Recommendation

1. Accept the signed conciliation agreements attached to this report.
2. Send attached letters.
3. Close the file in this matter.

DATE 3/8/79

William C. Oldaker
William C. Oldaker
General Counsel
by Gary L. Johansen

ATTACHMENTS: Conciliation Agreements signed by

1. James Madrid on behalf of the Committee
2. Salvador M. Ramos on behalf of Ramos and Graff
3. Henry Aguilar, Sr.

Copy of check covering civil penalty
Three letters

7904012107 9

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Madrid
c/o Compressor Equipment
1933 San Fernado Road
Los Angeles, California 90065

Re: MUR 603(78)

Dear Mr. Madrid:

Enclosed please find a copy of the signed conciliation agreement entered into by yourself on behalf of the Committee to elect Jim Madrid and the Federal Election Commission.

The file in this matter is now closed.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7940121080

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
19532 Victory Boulevard
Reseda, California 91335

Re: MUR 603(78)

Dear Mr. Ramos:

Enclosed please find a copy of the signed conciliation agreement entered into by Ramos Graff and Associates and Federal Election Commission.

The file in this matter is now closed.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry Aguilar, Sr.
2570 E. Orange Grove
Pasadena, California 91107

Re: MUR 603(78)

Dear Mr. Aguilar:

Enclosed please find a copy of the signed conciliation agreement entered into by yourself and the Federal Election Commission.

The file in this matter is now closed.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

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Weinsenbaum

GCC
94413

FEDERAL ELECTION COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

'79 FEB 26 PM 2:43

In the Matter of)
) MUR 603(78)
Committee to Elect Jim Madrid)

901035

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent Committee to Elect Jim Madrid, violated 2 U.S.C. § 441a(f):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Committee to Elect Jim Madrid having duly entered into conciliation pursuant to § 437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has juridiction over respondent and the subject of this proceeding.

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

III. The respondent, Committee to Elect Jim Madrid, accepted a $10,937.43 contribution.

Therefore, respondent Committee to Elect Jim Madrid agrees:

I. Respondent's action in accepting a contribution in excess of the limit of $1000 per election is in violation of 2 U.S.C. § 441a(f).

7 9 0 4 0 1 2 1 0 8 3

II. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

Date

William C. Oldaker
General Counsel
Federal Election Commission

2-23-79.
Date

James Madrid
James Madrid
on behalf of
The Committee to Elect
Jim Madrid

7904012108 4

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Ramos Graff and Associates	)	MUR 603(78)

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent, Ramos Graff and Associates, violated 2 U.S.C. § 441a(a)(1)(A):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Ramos Graff and Associates having duly entered into conciliation pursuant to § 437g(a)(5) do hereby agree as follows:

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

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

III. The respondent Ramos Graff and Associates, by absolving candidate Jim Madrid of a $10,937.42 debt not considered in the ordinary course of business, therefore made a $10,937.42 contribution to the campaign.

Therefore, respondent Ramos Graff and Associates agrees:

I. Respondent's actions in contributing in excess of the limitation is in violation of 2 U.S.C. § 441a(a)(1)(A).

II. Respondent will pay a civil penalty in the amount of $200 pursuant to 2 U.S.C. § 437g(a)(6)(B)(i).

III. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

III. It is agreed that respondent Ramos Graff and Associates shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

Date

William C. Oldaker
General Counsel
Federal Election Commission

12/18/78
Date

Salvador M. Ramos
Ramos Graff and Associates

MONEY ORDER
WILSHIRE-BERKELEY BRANCH
Bank of America
NATIONAL TRUST AND SAVINGS ASSOCIATION
SANTA MONICA, CALIFORNIA

PAYABLE AT ANY DOMESTIC BRANCH OF THIS BANK

No. 0939 85214

DATE 939 DEC 15 78

15-66/1220

PAY TO THE ORDER OF F.E.C $200.00

Bank of America 200 dol's 00 cts DOLLARS

Good For NOT MORE THAN Five Hundred Dollars

PURCHASER Salvador M. Ramos

A. W. CLAUSEN - PRESIDENT

⑈085214⑈ ⑆1220-0066⑆ 09390-85000⑈

GCC
6022

RECEIVED
FEDERAL ELECTION
COMMISSION

BEFORE THE FEDERAL ELECTION COMMISSION

'79 JAN 2 AM 9:43

In the Matter of)
)
Mr. Henry Aguilar, Sr.) MUR 603(78)

609736

Conciliation Agreement

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable causes to believe that Mr. Henry Aguilar,Sr., (hereinafter "Respondent") has violated 2 U.S.C. § 441g:

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

WHEREFORE, Respondent agrees:

A. That the Respondent made a $1,000 contribution in U.S. currency to Mr. Jim Madrid and the Committee to Elect Jim Madrid.

B. That the making of a contribution in currency to or for the benefit of a candidate for Federal office in excess

of $100 constitutes a violation of 2 U.S.C. § 441g.

C. That Respondent has therefore violated 2 U.S.C. § 441g.

D. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

IV. General Conditions

A. 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.

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date

William C. Oldaker
General Counsel
Federal Election Commission

12/22/78
Date

Henry Aguilar Sr.
Henry Aguilar, Sr.

1933 San Fernando Rd.
L.A. Calif. 90065

CERTIFIED
No. 647685
MAIL

FEDERAL ELECTION COMMISSION

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

FEB 26 PM 2:43

RECEIVED
FEDERAL ELECTION COMMISSION

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

February 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. James Madrid
c/o Compressor Equipment
1933 San Fernando Road
Los Angeles, California 90065

Re: MUR 603(78)

Dear Mr. Madrid,

Your letter of January 8, 1979, addressed to Anne Weissenborn of the Office of General Counsel has been received.

In your letter you assert that the Committee to Elect Jim Madrid and Ramos Graff and Associates were the same entity and that therefore Ramos Graff was responsible for any violations of the Federal Election Campaign Act. It is the position of this Office that while there are many indications that Ramos Graff did control your campaign the Committee remained a separate entity for purposes of the Act. Therefore, it is necessary that a conciliation agreement be signed on behalf of the Committee.

Enclosed please find a revised proposed conciliation agreement. As you will note, the civil penalty included in the first proposal has been dropped in view of what are seen as mitigating circumstances. If you are willing to sign this agreement on behalf of the Committee, please do so and return it as soon as possible. The agreement will then be submitted to the Commission for approval. If all of the signed agreements involved in this matter are approved, the file in this matter will be closed.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7904012109 2

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PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:
James Madrid

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	993999	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
2/26/79

POSTMARK
CLASSIFIED STA

5. ADDRESSEE'S ADDRESS (Only if requested)
[redacted]
1933 Fox Farm Rd

6. UNABLE TO DELIVER BECAUSE:
L-11-90218

CLERK'S INITIALS

☆GPO 1977-0-249-595

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 603(78)
Committee to Elect Jim Madrid	)	

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent Committee to Elect Jim Madrid, violated 2 U.S.C. § 441a(f):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Committee to Elect Jim Madrid having duly entered into conciliation pursuant to § 437g(a)(5), do hereby agree as follows:

I. That the Federal Election Commission has juridiction over respondent and the subject of this proceeding.

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

III. The respondent, Committee to Elect Jim Madrid, accepted a $10,937.43 contribution.

Therefore, respondent Committee to Elect Jim Madrid agrees:

I. Respondent's action in accepting a contribution in excess of the limit of $1000 per election is in violation of 2 U.S.C. § 441a(f).

7904012109 4

II. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

Date	William C. Oldaker General Counsel Federal Election Commission
Date	James Madrid on behalf of The Committee to Elect Jim Madrid

7 9 0 4 0 1 2 1 0 9 5

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

MEMORANDUM TO CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

DATE: FEBRUARY 15, 1979

SUBJECT: MUR 603 (78) - Interim Conciliation Report - dated 2-13-79; Received in OCS 2-14-79, 10:20

The above-named document was circulated on a 24 hour no-objection basis at 4:30, February 14, 1979.

The Commission Secretary's Office has received no objections to the Interim Conciliation Report as of 4:30 this date.

7904012109 5

February 14, 1979

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 603

Please have the attached Interim Conciliation Report distributed to the Commission.

Thank you.

7904012109 7

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION

79 FEB 14 A10: 20

In the Matter of	)	
	)	
Committee to Elect Jim Madrid	)	MUR 603(78)
Ramos Graff and Associates	)	
Mr. Henry Aguilar, Sr.	)	

INTERIM CONCILIATION REPORT

On September 20, 1978, the Commission found reasonable cause to believe that the Committee to Elect Jim Madrid ("the Committee") and Ramos Graff and Associates had violated 2 U.S.C. § rrla(f) and $441a(a)(1)(A) respectively. On December 13, 1978, the Commission found reasonable cause to believe that Mr. Henry Aguilar, Sr., had violated 2 U.S.C. § 441g by making an excessive cash contribution to the Committee.

Signed conciliation agreements have been received from both Mr. Aguilar and Ramos Graff and Associates. Salvador Ramos has also submitted $200 in payment of the civil penalty included in the Ramos Graff agreement.

Mr. Madrid has written again to reiterate his argument that Ramos Graff and Associates was responsible for any violations of the Federal Election Campaign Act by the Committee. Another attempt is being made to reach an agreement with Mr. Madrid concerning mutually acceptable language for a conciliation agreement which he would sign on behalf of the Committee.

2/13/79
Date

William C. Oldaker
General Counsel

7904012098

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

MEMORANDUM TO CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

DATE: JANUARY 15, 1979

SUBJECT: MUR 603 (78) - Interim Conciliation Report dated 1-11-79; Received in OCS 1-12-79, 10:45

The above-named document was circulated on a 24 hour no-objection basis at 3:30, January 12, 1979.

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

7904012109 9

January 12, 1979

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 603

Pleasehhave the attached Interim Concil Report on MUR 603 distributed to the Commissinn.

Thank you.

7904012110

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

79 JAN 12 A10: 45

In the Matter of	)	MUR 603 (78)
	)	
	)	
Committee to Elect Jim Madrid	)	
Ramos Graff and Associates	)	
Mr. Henry Aguilar, Sr.	)	

INTERIM CONCILIATION REPORT

On September 20, 1978, the Commission found reasonable cause to believe that the Committee to Elect Jim Madrid ("the Committee") and Ramos Graff and Associates had violated 2 U.S.C. § 441a(f) and 2 U.S.C. § 441a(a)(1)(A) respectively by accepting and making an excessive contribution. On December 13, 1978, the Commission found reasonable cause to believe that Mr. Henry Aguilar, Sr., had violated 2 U.S.C. § 441g by making an excessive cash contribution to the Committee.

Letters and proposed conciliation agreements were sent to all of the above respondents. Signed conciliation agreements have been received from Ramos Graff and Associates and Mr. Aguilar. In addition, a check covering an assessed civil penalty has been received from Ramos Graff.

Mr. Madrid has indicated that he prefers to settle the matter as regards the Committee personally. The Committee is now defunct and the last treasurer resigned on December 26, 1976, at which point Mr. Madrid began preparing the Committee's reports. Mr. Madrid is in the process of preparing a revision of the proposed conciliation agreement sent to the Committee. We should receive his counter proposal shortly.

1/11/79
Date

WILLIAM C. OLDAKER
General Counsel

7904012110 1

Henry V. Aguilar
2570 E. Orange Grove
Pasadena, Calif., 91107

August 22, 1978

Mr. Melford Dunken Treas.
Committee To Elect
Jim Madrid

Re: MUR 603(78)

Dear Mr. Dunken:

I received notification from the Federal Election Commission, that I was in violation of 2USCS441G of the Federal Election Campaign Act of 1971 as amended. Enclosed is the letter for your information. I would like to resolve this matter immediately.

I was advised by Susan Seyfarth, who is assigned to this matter. Her phone number is (202) 523-4175. Under Review No. "MUR 603 (78) I am requesting that you return $900.00 to me in order to resolve this matter.

Sincerely,

Henry V. Aguilar

Henry V. Aguilar

7904012102

HENRY V. AGUILAR
2570 E. ORANGE GROVE
PASADENA, CALIF. 91107

AUGUST 24, 1978.

Mr. AGUILAR:

I RECEIVED YOUR LETTER, REFERENCE THE COMMUNICATION FROM THE FEDERAL COMMISSION, WASHINGTON D.C.
I AM SORRY THAT YOU ARE BEING THREATENED, AS SUCH. HOWEVER, I TRIED TO REACH YOU BEFORE THE COMMISSION DECIDED TO TAKE ACTION. I SENT YOU TWO LETTERS (REGISTERED) ONE IN MARCH 1978, AND ONE IN APRIL 1978. FOR SOME REASON OR ANOTHER THEY WERE IGNORED. I WAS TRYING TO REACH YOU TO RESOLVE THIS SITUATION. AGAIN, IN ORDER TO RECONCILE THIS MATTER I MUST SEE YOU IN PERSON.

I WOULD BE PLEASED TO MEET WITH YOU TO EXPLAIN THE SITUATION IN ITS ENTIRETY. I WILL BE AVAILABLE TO SEE YOU AFTER THE COMING HOLIDAY, POSSIBLY AFTER THE FIFTH OF SEPTEMBER. PLEASE DROP ME A NOTE WHEN YOU WILL BE AVAILABLE. IN THE THE INTERIM YOU CAN ALSO SEND A NOTE TO THE COMMISSION THAT YOU HAVE MADE CONTACT AND WE ARE IN THE PROCESS OF RESOLVING THE MATTER.

RESPECTFULLY,

JIM MADRID
1933 SAN FERNANDO ROAD
L.A. CALIF. 90065.

7904012103

Henry V. Aguilar
2570 E. Orange Grove
Pasadena, California 91107
September 1, 1978

Mr. Melford Dunkin
c/o Mr. Jim Madrid
1933 San Fernando Rd;
Los Angeles, Ca. 90065

Dear Mr. Madrid,

Please refer to my letter of August 22, 1978 to Mr. Melford Dunkin.

Please! I do not wish to be involved with the Federal Commissioner any longer. This is a serious case. The only way to resolve this case is for you to send me (Henry V. Aguilar) a certified check for $900.00, so I can prove to the Federal Commissioner in Washington D. C. that you have returned the illegal election contribution.

I have to send a copy to the Federal Election Commission to resolve this case number - MUR 603 (78).

I have been in and out of the state for the past two years. Right now I'm away from home most of the time. I just got your letter.

Sincerely,

Henry V. Aguilar

7904012104

Mr. Henry Aguilar
2570 E. Orange Grove
Pasadena , Calif. 91107

Sept. 5, 1978.

Dear Mr. Aguilar:

Received your letter of September 2, 1978. As I explained in my letter you received, I must talk to you in order to resolve this matter. I'm sure that you are as anxious to do this as I am. First, the committee you are referred to, no longer exists. I have severed all relations with the Ramos/ Graff Associates, who were in complete chagge of all the campaign, Business and Funds. All funds that were accepted by them have been spent. The committee was DISBANDED immediately after the 1976 Election. I was audited by the commission you mention last December 1977. Any further negotiations any one may have in reference to this committee must be with the committee itself. Or namely the Ramos / Graff firm/. However , Ihave been able to resolve some of the differences and demands of the commission . I, again offer to get together with you to resolve this matter,.

Respectfully,

JIM MADRID

1933 San Fernando Road
Los Angeles, Calif. 90065.

7904012105

Henry V. Aguilar
2570 E. Orange Grove
Pasadena Calif. 91107

7904012

RECEIVED
FEDERAL ELECTION
COMMISSION

'79 JAN 2 AM 9:43

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

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

December 14, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry Aguilar, Sr.
2570 E. Orange Grove
Pasadena, California 91107

Re: MUR 603(78)

Dear Mr. Aguilar,

This letter is to inform you that the Federal Election Commission has found reasonable cause to believe that you have violated 2 U.S.C. § 441g by making a $1,000 cash contribution to Mr. Jim Madrid and the Committee to Elect Jim Madrid.

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

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4178.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7904012107

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Mr. Henry Aguilar, Sr.	)	MUR 603(78)

Conciliation Agreement

This matter having been initiated by the Commission in the ordinary course of carrying out its supervisory responsibilities, and, after an investigation, the Commission having found reasonable causes to believe that Mr. Henry Aguilar,Sr., (hereinafter "Respondent") has violated 2 U.S.C. § 441g:

WHEREFORE, the Commission and Respondent, having duly entered into conciliation as provided for in 2 U.S.C. § 437(a)(5), do hereby agree as follows:

I. The Federal Election Commission has jurisdiction over the Respondent and the subject matter in this case.

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

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

WHEREFORE, Respondent agrees:

A. That the Respondent made a $1,000 contribution in U.S. currency to Mr. Jim Madrid and the Committee to Elect Jim Madrid.

B. That the making of a contribution in currency to or for the benefit of a candidate for Federal office in excess

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of $100 constitutes a violation of 2 U.S.C. § 441g.

C. That Respondent has therefore violated 2 U.S.C. § 441g.

D. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

IV. General Conditions

A. 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.

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date	William C. Oldaker General Counsel Federal Election Commission
Date	Henry Aguilar, Sr.

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of $100 constitutes a violation of 2 U.S.C. § 441g.

C. That Respondent has therefore violated 2 U.S.C. § 441g.

D. That Respondent will now, and in the future, comply in all respects with the Federal Election Campaign Act of 1971, as amended.

IV. General Conditions

A. 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.

B. It is further agreed that this Conciliation Agreement is entered into in accordance with 2 U.S.C. § 437g(a)(5)(A), and that this Agreement shall constitute a complete bar to any further action by the Commission with regard to the matter set forth in this Agreement.

C. It is mutually agreed that this Agreement will become effective on the date that all parties hereto have executed the same and the Commission has approved the entire Agreement.

FEDERAL ELECTION COMMISSION

Date	William C. Oldaker General Counsel Federal Election Commission
Date	Henry Aguilar, Sr.

7904012110

GCC# 9059

JANUARY 8, 1979

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

FEDERAL ELECTION COMMISSION

ANN WEISSENBORN ADVOCATE.

'79 JAN 15 PM 3:08

DEAR PERSON:

I REFER MY COMMUNICATION OF NOVEMBER 14, 1978, TO YOU, WHERE I HAVE OUTLINED MY POSITION IN REFERENCE TO THIS CASE.

IN YOUR PHONE CONVERSATION OF JANUARY 2, 1979, YOUR INFORMATION WAS THAT SETTLEMENTS HAVE BEEN ACCEPTED BY THE COMMISSION FROM THE RECENT CONTACTS WITH THE RAMOS AND GRAFF ASSOCIATES. I INTERPRET THAT THE REFERENCE OF ANY DEVIATION OF COMMISSION REQUIREMENTS ARE THE RESPONSIBILITY OF THE "PROFFESSIONAL" FIRM THAT HANDLED THE CAMPAIGN INCLUDING ALL THE APPOINTMENTS OF THE COMMITTEE.

ON YOUR REQUEST TO REVIEW THE CONCILIATION AGREEMENT OF YOUR LETTER OF NOVEMBER 8, 1978, I CAN ONLY CONCLUDE THAT ANY AGREEMENTS TO BE RECONCILED ARE THE RESPONSIBILITY OF THE RESPONDENT, AS MENTIONED, THE COMMITTEE TO ELECT. IN THIS CASE IS THE RAMOS/GRAFF ASSOCIATES PUBLIC RELATIONS FIRM, AND THEIR APPOINTEES. WITH A CLEAR CONCIENCE, I CANNOT JUSTIFY TO ASSUME ANY RESPONSIBILITIES FOR A PROFESSIONAL FIRM THAT REPRESENTED THEMSELVES AS A POLITICALLY AND ABLE PUBLIC RELATIONS ASSOCIATES.

IN CONCLUSION, I HAVE ATTACHED COPY OF THE ORIGINAL LETTER SENT TO ME IN AUGUST 16, 1977. I HAVE UNDERLINED A PORTION OF THAT LETTER WHICH INFLUENCED ME TO INTERPRET IT TO BE A PART OF AN EDUCATIONAL PROCESS TO INSURE FUTURE ACTIVITIES AS A CONCEPT TO BE RECKONED WITH AND NOT AS A MEANS TO PUNISH.

THE ONLY SECTION OF THE CONCILIATION AGREEMENT, THAT I CAN ACCEPT IS THE ITEM III RESPONDENT AGREES THAT — I — WILL NOT UNDERTAKE ANY ACTIVITY WHICH IS IN VIOLATION OF THE FEDERAL ELECTION CAMPAIGN ACT, 2U.S.C. — 431, ET SEQ.

DUE TO MY ADVANCED AGE AND NO LONGER ABLE OR HOLDING ANY REGULAR EMPLOYMENT, ANY FISCAL PENALTY IMPOSED, WILL BE A SEVERE HARDSHIP. I, THEREFORE PETITION OR PROPOSE CONSIDERATION OF A PROBATIONARY ACTION.

RESPECTFULLY,

Jim Madrid

JAMES MADRID

ENCL. 1

7904012111

900243

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

August 16, 1977

Mr. Jim Madrid
2122 North Broadway
Los Angeles, California 90031

Dear Mr. Madrid:

The Commission wishes to advise you that your campaign committee has been selected for audit pursuant to the Audit Policy adopted by the Commission on November 11, 1976. That policy provides for a schedule of routine general audits of various types of political committees, including ten percent of the 1976 Senate and House races selected by computer on a random basis. Applying this policy to the 1976 election, the Federal Election Commission will examine the campaign finance records and reports of approximately one hundred Senate and House candidates involved in the four Senate and forty-four House races which were selected. Because the 1976 elections were the first conducted under the complex 1976 amendments to the Federal Election Campaign Act, a major focus of the Commission's field audits is to provide assistance to candidates and committees in the development of better recordkeeping and reporting systems to facilitate timely and accurate public disclosure and compliance with the Act.

All audits of the randomly selected Congressional races are expected to be completed and reports publicly released by April, 1978. These audits are being scheduled according to the sequence of primary elections in order to complete all audits as far in advance of any future election as is possible.

Therefore, approximately two weeks prior to the commencement of your audit, our Lead Auditor for your campaign committee's audit will contact your Treasurer by telephone to mutually agree upon a date to begin the audit and to establish a mutually convenient location for the audit. If your committee should be unable to provide convenient work space for two auditors, the Lead Auditor will arrange for adequate work space at Commission expense. All financial records of your committee, including bank statements, together with deposit slips and cancelled checks, contribution records, invoices or receipted bills, journals and/or ledgers maintained by the committee should be available for inspection when the audit begins.

7904012112

JUNE 20,1978.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: MUR 603(78).

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

WILLIAM C. OLDAKER
GENERAL COUNSEL

DEAR SIR:

IN WHAT STARTED TO BE AN ASSISTANCE TO RECONCILE AND CLOSE THE CAMPAIGN ISSUE, YOU NOW THREATEN TO TAKE AN ACTION.
I HAVE COOPERATED COMPLETLY AND WITHOUT ANY MALICE, AND SURELY HONESTLY, WITH YOUR ORIGINAL REQUEST AND ALL SUBSEQUENT DEMANDS.
I HAVE FURNISHED ALL RECORDS, FORMS, INFORMATION, TO BRING THIS CASE TO A COMPLETE CLOSE, SO WAS I INFORMED.

I READ IN YOUR RECENT NOTICE THAT AN ACTION IS DUE, FROM YOUR DECISION OF ALL THAT I HAVE SUBMITTED TO YOU AND THAT I HAVE AN ALTERNATIVE TO SECURE LEGAL COUNSEL. I, AM NOT ABLE OR IN A POSITION FINANCIALLY TO COMPENSATE ANY ONE, OR LEGAL COUNSEL, FOR ANY ACTION YOU MAY IMPLY. I HAVE FAITHFULLY COMPLIED WITH YOUR REPRESENTATIVES TO FINALIZE AND CLOSE THIS CASE AND ANY FURTHER CONTACT. I WAS ADVISED WHAT TO DO, AND RELIED ON THE HONESTY AND MOTIVES OF THOSE YOU PUT IN CHARGE TO ASSIST ME. I HAVE COMPLIED WITH ALL REQUESTS AND HAVE DONE ALL THAT IS WITHIN MY RECORDS AND COOPERATION WITH YOUR DEPARTMENT.

ANY FURTHER DEMANDS, I RECOMMEND, YOU DIRECTLY CONTACT THE P.R. FIRM RAMOS AND GRAFF ASSOCIATES WHO ORIGINALLY ASSUMED FULL RESPONSIBILITY FOR THE CAMPAIGN AN ALSO THEIR APPOINTMENTS OF OFFICERS.
I, DID NOT AT ANY TIME AGREE TO PAY ANY ONE OR ORGANIZATION FOR ANY PARTICIPATION IN THE CAMPAIGN. ASSUREDLY, BECAUSE I AM NOT, AND NEVER WAS IN A FINANCIAL POSITION TO ASSUME THAT RESPONSIBILITY.

RESPECTFULLY,

Jim Madrid.

JIM MADRID

7904012113

7904012114

LOS ANGELES CALIF. JAN 1979

U.S. POSTAGE 1 40

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

RETURN RECEIPT REQUESTED

80 79 JAN 15 AM 6

ATTENTION: ANN WEISSENBORN - ADVOCATE

CERTIFIED
No. 647682
MAIL

GCC 5936

RECEIVED
FEDERAL ELECTION
COMMISSION

December 14, 1978

'78 DEC 20 AM 10:52

Ms. Anne Weissenborn
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

808564

Re: MUR 603 (78)

Dear Ms. Weissenborn:

In accordance with Conciliation Agreement handed the signor of this instrument, I am forwarding $200 (two hundred dollars per paragraph II pursuant to 2 USC S 437g(a) (6) (B) (i)).

I am making such payment, which I can ill afford, under Protest.

I have not been in any position in the past fifteen years to donate any monies to any political candidate, let alone $10,000. I was employed by Jim Madrid and it was understood that he or his committee was to, at least, pay expenses. As things ended up, first, his idiot treasurer did not set things up for accountability and secondly, no money being raised whatsoever left me holding the bag. Now, I am being told that the $10,937.42 debt was not considered in the ordinary course of business and therefore this is considered a donation. My alternative, of course, is fighting a civil suit, which means an attorney for which I do not have money. And, so, what do I do not having money to fight an injust and ridiculous conclusion by the Federal Election Commission?

This agency's authority equates with plea bargaining by our justice system, where one is charged with suspicion of a charge, but for a guilty plea of much lesser consequence one is free. So, one acknowledges guilt for the record to circumvent expenses, embarrassment, and time.

This course of settlement then, is considered final and complete.

Sincerely,

Salvador M. Ramos

SMR/er

P.S. The reason the mail was not received was because our offices are used for warehousing only and we seldom go there more than once every two or three months.

7904012115

MONEY ORDER
WILSHIRE-BERKELEY BRANCH

Bank of America
NATIONAL TRUST & SAVINGS ASSOCIATION
SANTA MONICA, CALIFORNIA

PAYABLE AT ANY DOMESTIC BRANCH OF THIS BANK

No. 0939 85214

DATE 939 DEC 13 78 16-66/1220

PAY TO THE ORDER OF F.E.C $200.00

Bank of America 20 Bank Dots DOLLARS

Good For NOT MORE THAN Five Hundred Dollars

PURCHASER Salvador M. Ramos

A. W. CLAUSEN - PRESIDENT

⑈085214⑈ ⑆1220⑈0066⑆ 09390⑈85000⑈

S. M. RAMOS
19532 Victory Boulevard
Reseda, California 91335

FEDERAL ELECTION COMMISSION

'78 DEC 20 AM 10:52

LOS ANGELES DEC 19 '78 CALIF

3 60

Ms. Anne Weissenborn
FEDERAL ELECTION COMMISSION
1325 K Street, N.W.
Washington, D.C. 20463

REGISTERED
NO. 680064

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 603 (78)
Committee to Elect Jim Madrid	)	
Ramos Graff and Associates	)	
Mr. Henry Aguilar, Sr.	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on December 13, 1978, the Commission determined by a vote of 5-0 to adopt the following recommendations, as set forth in the General Counsel's Report dated December 8, 1978, regarding the above-captioned matter:

1. Find reasonable cause to believe that Mr. Henry Aguilar, Sr., has violated 2 U.S.C. §441g.

2. Send the conciliation agreement and letter attached to the above-named report.

Voting for this determination were Commissioners Aikens, Tiernan, McGarry, Thomson, and Harris.

Attest:

12/13/78
Date

Margaret E. Chaney
for Marjorie W. Emmons
Secretary to the Commission

Received in Office of Commission Secretary: 12-8-78, 12:49
Circulated on 48 hour vote basis: 12-11-78, 9:00

7904012118

December 8, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 603

Please have the attached General Counsel's Report on MUR 603 distributed to the Commission on a 48 hour tally basis.

Thank you.

7904012119

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY
78 DEC 8 P12: 49

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 603 (78)
Committee to Elect Jim Madrid	)	
Ramos Graff and Associates	)	
Mr. Henry Aguilar, Sr.	)	

General Counsel's Report

Summary of Allegations and Commission Action

During the Audit Division's review of the records of the Committee to Elect Jim Madrid ("the Committee"), evidence was discovered that Mr. Henry Aguilar had made a $1,000 cash contribution to the Committee in apparent violation of 2 U.S.C. § 441g; that Ramos Graff and Associates had made a contribution of $10,937.42 to the Committee in violation of 2 U.S.C. § 441a (a)(1)(A); and that the Committee had accepted the $10,937.42 contribution from Ramos Graff and Associates in violation of 2 U.S.C. § 441a(f). On June 14, 1978, the Commission found reason to believe that the above violations had occurred and letters were sent to the respondents informing them of the Commission's action.

Responses were received from the Mr. Jim Madrid ("the Candidate") on behalf of the Committee and from Ramos Graff and Associates. The letter sent to Mr. Aguilar was returned as undeliverable and has since been remailed twice, the second time successfully.

On September 20, 1978, the Commission found reasonable cause to believe that the Committee and Ramos Graff and Associates had violated 2 U.S.C. § 441a(f) and § 441a(a)(1)(A) respectively. Conciliation agreements have been sent

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to both respondents. A reply has been received from the Candidate; however, the letter and conciliation agreement sent to Ramos Graff and Associates were returned unclaimed. A second letter, together with an agreement, was sent to Ramos Graff on November 8, 1978 by both certified and first class mail; no response or proof of delivery has yet been received.

On September 20 the Commission also decided to delay further action with regard to Mr. Aguilar's violation of 2 U.S.C. § 441g until a response to the reason to believe notification had been received. We have not as yet received such a response.

Evidence

According to information gathered by the Audit Division, a third party check drawn on a corporate account for $1,000 was given to the Committee by Mr. Aguilar and was deposited on June 7, 1976. Later the check was returned by the bank due to insufficient funds. On June 11, 1976, the Committee deposited $1,000 in cash received from the same contributor, the Candidate having accepted the cash because he believed that a third party check drawn on a corporate account would constitute a corporate contribution. He has stated that he was not aware of the prohibition against cash contributions in excess of $100.

In response to a recommendation from the Audit Division, the Candidate attempted to locate Mr. Aguilar in order to refund the excessive amount of his cash contribution, but to no avail. We have received no information regarding any

7904012121

attempts on Mr. Aguilar's part to secure such a refund.

We believe that Mr. Aguilar's contribution does represent a violation of 2 U.S.C. § 441g; however, there exist mitigating factors including the Candidate's own actions based upon his misunderstandings concerning the legality of receiving a third party check written on a corporate account and the illegality of a cash contribution in excess of $100. We therefore recommend a finding of reasonable cause to believe that Mr. Aguilar has violated 2 U.S.C. § 441g, but we also recommend that the conciliation agreement to be sent to him contain only an acknowledgement of the illegality involved and no civil penalty.

7904011122

Recommendations

1. Find reasonable cause to believe that Mr. Henry Aguilar, Sr., has violated 2 U.S.C. § 441g.
2. Send attached conciliation agreement and letter.

12/8/78
Date

William C. Oldaker
General Counsel

Attachments: Conciliation agreement and letter

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry Aguilar, Sr.
2570 E. Orange Grove
Pasadena, California 91107

Re: MUR 603(78)

Dear Mr. Aguilar,

This letter is to inform you that the Federal Election Commission has found reasonable cause to believe that you have violated 2 U.S.C. § 441g by making a $1,000 cash contribution to Mr. Jim Madrid and the Committee to Elect Jim Madrid.

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

Enclosed please find a conciliation agreement which this Office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of this agreement, please sign it and return it to the Commission within ten days of your receipt of this letter. If you have any questions, please contact Anne A. Weissenborn, the attorney assigned to this matter, at (202) 523-4178.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7 9 0 4 0 1 2 1 1 2 3

GCOW
5644

NOVEMBER 14, 1978

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 NOV 20 AM 2:10

807923

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

DEAR ANN WEISSENBORN:

REFERENCE YOUR LETTER NOVEMBER 8, 1978. RE - MUR 603 (78).

AS I UNDERSTAND THE PROPOSAL OF THIS LETTER WHICH IS ORIGINALLY THE RESPONSIBILITY OF THE TREASURER, WHO WAS APPOINTED BY THE FIRM OF RAMOS AND GRAFF ASSOCIATES, REQUESTS FOR ME TO ASSUME THE RESPONSIBILITY AND PAY THE CIVIL PENALTY DETERMINED BY THE COMMISSION.

I WOULD REQUEST YOUR CONSIDERATION, OF THE FACTS OF THE CONDUCT OF THE CONSULTANTS AND MANAGEMENT FIRM WHO ORIGINALLY PROPOSED TO ME, TO MAKE ME A "CONGRESSMAN" - I AGREED, HOWEVER, WE DID NOT HAVE ANY DOCUMENTED AGREEMENT. FOR WHATEVER REASON, IT DID NOT MATERIALIZE. AS THE CAMPAIGN PROGRESSED AND THEY WERE NOT ABLE TO GENERATE THE REQUIRED ACTIVITY, FISCAL, AND COMMITEMENT OF VOTERS PARTICIPATION, AND I WAS ALSO "WRITTEN OFF" BY MY PARTY AFFILIATION AS AN IMPOSSIBLE, THE ASSOCIATES RETIRED AS SUPPORTERS. DURING THIS PERIOD, ALL RECORDS AND ACCOUNTING WAS IN THEIR POSSESSION. THEY MADE ALL COMMITTEE APPOINTMENTS AND ADVISED THAT THEY WERE WORKING WITHIN ALL COMMISSION REGULATIONS.

AS I RECALL, IN LATE AUGUST OR SEPTEMBER OF 1976 - I WAS UNABLE TO GET ANY ATTENTION FROM RAMOS AND GRAFF. THE BALANCE OF TIME UP TO THE NOVEMBER ELECTION DATE, I WAS FORCED TO CARRY ON WITHOUT THEIR ASSISTANCE. I POINT OUT THAT I HAVE CONSCIENTIOUSLY COOPERATED AND ENDEAVORED TO COMPLY WITH ALL REQUESTS FROM THE FEDERAL ELECTION COMMITTEE, AT THE SAME TIME I AM CONCERNED TO RESOLVE THIS SITUATION AS AGREEABLY AS POSSIBLE. HOWEVER, I CAN'T HELP EXPRESS THAT IT DOES NOT APPEAR TO BE EQUABLE FOR ME TO ASSUME A PENALTY FOR THE RESPONSIBILITY OF A FIRM OR PERSONS BEYOND MY CONTROL. YOUR CONSIDERATION WILL BE MOST APPRECIATED.

RESPECTFULLY,

Jim Madrid

JAMES MADRID

7904012124

M MADRID
33 SAN FERNANDO RD.
L.A. CALIF. 90065.

LOS ANGELES, CA
-PM
14 NOV
1978
12th DIST

NOV 21 AM 2:10

FEDERAL ELECTION COMMISSION
1324 - K STREET N.W.
WASHINGTON, D.C 20463

ATTION: ANN WEISENBORN

CERTIFIED
No. 647675
MAIL

RETURN RECEIPT
REQUESTED

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

MEMORANDUM TO CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

DATE: NOVMEBER 13, 1978

SUBJECT: MUR 603 - Interim Status Report dated 11-3-78, Signed by GC: 11-8-78 Received in OCS: 11-9-78, 10:00

The above-named document was circulated on a 24 hour no-objection basis at 2:00, November 9, 1978.

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

7904012126

November 9, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 603

Please have the attached Interim Status Report on MUR 603 distributed to theCCommission.

Thakk you.

7904012127

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

BEFORE THE FEDERAL ELECTION COMMISSION
November 3, 1978

78 NOV 9 A10: 00

In the Matter of	)	
	)	
	)	MUR 603 (78)
Committee to Elect Jim Madrid	)	
Ramos Graff and Associates	)	
Henry Aquilar	)	

INTERIM STATUS REPORT

On June 14, 1978, the Commission found reason to believe that the Committee to Elect Jim Madrid ("the Committee") had violated 2 U.S.C. § 441a(f) by accepting an excessive contribution from Ramos Graff and Associates, that Ramos Graff and Associates had violated 2 U.S.C. § 441a (a)(1)(A) by making an excessive contribution to the Committee, and that Mr. Henry Aguilar had violated 2 U.S.C. § 441g by making an excessive cash contribution to the Committee. On September 20, 1978, the Commission found reasonable cause to believe that the first two apparent violations listed above had occurred, further action with regard to Mr. Aguilar's violation being delayed pending receipt of his response to the reason to believe notification.

Letters and proposed conciliation agreements were sent to the treasurer of the Committee and to Ramos Graff and Associates on September 22, 1978.

7904012128

These letters and agreements have been returned as undeliverable. We are now making a second attempt to notify these respondents. No written response to the Commission's findings has yet been received from Mr. Henry Aguilar, and we plan to contact him again by telephone.

11/8/78
Date

William C. Oldaker
General Counsel

7904011129

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

November 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Jim Madrid
Compressor Equipment
1933 San Fernando Road
Los Angeles, California 90065

Re: MUR 603 (78)

Dear Mr. Madrid:

On September 20, 1978, the Commission determined there is reasonable cause to believe that the Committee to Elect Jim Madrid violated 2 U.S.C. § 441a(f) by accepting a contribution which, in the aggregate, exceeded $1,000.

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

If you decide to comply with the terms of the enclosed agreement, please sign and return it to the Commission along with the civil penalty within thirty (30) days. If you have any questions, please do not hesitate to contact Anne Weissenborn (202) 523-4178, the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

cc: First Class Mail

P.S. This letter was originally sent to Mr. Melford Duncan at your address, but it has been returned to this office as undeliverable.

7904012130

BUR 603 AW

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO: Jim Madrid
Compressor Equipment
1933 San Fernando Road
Los Angeles, Calif 90065

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	438065	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: 11/13/78

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO 1977—O—249-595

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee to Elect Jim Madrid) MUR 603(78)

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent Committee to Elect Jim Madrid, violated 2 U.S.C. § 441a(f):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Committee to Elect Jim Madrid having duly entered into conciliation pursuant to § 437g(a)(5), do hereby agree as follows:

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

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

III. The respondent, Committee to Elect Jim Madrid, accepted a $10,937.42 contribution.

Therefore, respondent Committee to Elect Jim Madrid agrees:

I. Respondent's action in accepting a contribution in excess of the limit is in violation of 2 U.S.C. § 441a(f).

7904012132

II. Respondent will pay a civil penalty in the amount of $300 pursuant to 2 U.S.C. § 437g(a)(6)(B)(i).

III. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

III. It is agreed that respondent Committee to Elect Jim Madrid shall have 30 days from the date of this

7 9 0 4 0 1 2 1 1 3 3

agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

Date	William C. Oldaker General Counsel Federal Election Commission
Date	Melford Duncan, Treasurer Committee to Elect Jim Madrid

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

November 8, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd.
North Hollywood, California 91601

Re: MUR 603 (78)

Dear Mr. Ramos:

Enclosed is a letter sent to you on September 15, 1978, which contains notification that the Federal Election Commission has found reasonable cause to believe that Ramos Graff and Associates has violated 2 U.S.C. § 441a(a)(1)(A) by making a contribution to Jim Madrid in excess of $1,000. This letter was returned to the Commission as undeliverable.

One of our staff attorneys, Anne Weissenborn, has now been assigned to this matter. If you have any questions about the terms of the enclosed agreement, please contact her at (202) 523-4178.

7904012135

MUR 603

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

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

2. ARTICLE ADDRESSED TO: Sr. Salvador Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd
North Hollywood, Calif 91601

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 45848 | INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

POSTMARK NOV 29 1978

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

☆GPO 1977-0-249-526

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

September 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd.
North Hollywood, CA 91601

Re: MUR 603(78)

Dear Mr. Ramos:

On September 20,1978, the Commission determined there is reasonable cause to believe that Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended, by making a contribution to candidate Jim Madrid which, in the aggregate, exceeded $1,000.

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

If you intend to comply with the terms of the enclosed agreement, please sign and return it to the Commission along with the civil penatly, within thirty (30) days. If you have any questions, please contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7904012136

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Ramos Graff and Associates	)	MUR 603(78)

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent, Ramos Graff and Associates, violated 2 U.S.C. § 441a(a)(1)(A):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Ramos Graff and Associates having duly entered into conciliation pursuant to § 437g(a)(5) do hereby agree as follows:

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

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

III. The respondent Ramos Graff and Associates, by absolving candidate Jim Madrid of a $10,937.42 debt not considered in the ordinary course of business, therefore made a $10,937.42 contribution to the campaign.

7904012137

Therefore, respondent Ramos Graff and Associates agrees:

I. Respondent's actions in contributing in excess of the limitation is in violation of 2 U.S.C. § 441a(a)(1)(A).

II. Respondent will pay a civil penalty in the amount of $200 pursuant to 2 U.S.C. § 437g(a)(6)(B)(i).

III. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

7904012138

III. It is agreed that respondent Ramos Graff and Associates shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

Date	William C. Oldaker General Counsel Federal Election Commission
Date	Salvador M. Ramos Ramos Graff and Associates

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10/25

SS ~~Suffolk~~ 603

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

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

2. ARTICLE ADDRESSED TO:

M. Melford Duncan

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	945350	

(Always obtain signature of addressee or agent)

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

X

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

POSTMARK

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO: 1977—0—249-595

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

Moved no add
65150

POSTAGE AND FEES PAID

☒ Moved, left no address
☐ No such street
☐ Moved, not forwardable
☐ Addressee unknown

Mr. Melford Duncan, Treasurer
Committee to Elect Jim Madrid
c/o Jim Madrid
Compressor Equipment
1933 San Fernando Road
Los Angeles, CA 90065

CERTIFIED
943350

AW 10/25 Kept lit

SS Seyfarth 603

PS Form 3811, Apr. 1977 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO

Mr. Salvador M. Remo

3. ARTICLE DESCRIPTION

REGISTERED NO	CERTIFIED NO	INSURED NO
	943349	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

VA PAID 1977 POSTAGE

☆GPO 1977-O-249-585

2 1 1 2 1 4 0 0

Recorded

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

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CLAIM CHECK NO.
048706

☐ HOLD

DATE

1ST NOTICE
10-4

2ND NOTICE
10-11

RETURN

Detached from
PS Form 3849-A
July 1977

N.L.
9-26-78
no response
011-90

RETURNED TO SENDER

REASON CHECKED
Unclaimed ___ Refused ___
Addressee unknown ___
Insufficient Address ___
No such street ___ number ___
No such office in state ___
Do not remail in this envelope

Mr. Salvador M. Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd.
North Hollywood, CA 91601

POSTAGE AND FEES PAID

U.S. MAIL

CERTIFIED
943349

FEDERAL ELECTION COMMISSION

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

September 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Melford Duncan, Treasurer
Committee to Elect Jim Madrid
c/o Jim Madrid
Compressor Equipment
1933 San Fernando Road
Los Angeles, CA 90065

Re: MUR 603(78)

Dear Mr. Duncan:

On September 20, 1978, the Commission determined there is reasonable cause to believe that the Committee to Elect Jim Madrid violated 2 U.S.C. § 441a(f) by accepting a contribution which, in the aggregate, exceeded $1,000.

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

If you decide to comply with the terms of the enclosed agreement, please sign and return it to the Commission along with the civil penalty within thirty (30) days. If you have any questions, please do not hesitate to contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7904012144

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Committee to Elect Jim Madrid	)	MUR 603(78)

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent Committee to Elect Jim Madrid, violated 2 U.S.C. § 441a(f):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Committee to Elect Jim Madrid having duly entered into conciliation pursuant to § 437g(a)(5), do hereby agree as follows:

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

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

III. The respondent, Committee to Elect Jim Madrid, accepted a $10,937.42 contribution.

Therefore, respondent Committee to Elect Jim Madrid agrees:

I. Respondent's action in accepting a contribution in excess of the limit is in violation of 2 U.S.C. § 441a(f).

7 9 0 4 0 1 2 1 1 4 5

II. Respondent will pay a civil penalty in the amount of $300 pursuant to 2 U.S.C. § 437g(a)(6)(B)(i).

III. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

III. It is agreed that respondent Committee to Elect Jim Madrid shall have 30 days from the date of this

7 9 0 4 0 1 2 1 1 4 6

agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

_____ Date	_____ William C. Oldaker General Counsel Federal Election Commission
_____ Date	_____ Melford Duncan, Treasurer Committee to Elect Jim Madrid

7 9 0 4 0 1 2 1 1 4 7

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

September 21, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd.
North Hollywood, CA 91601

Re: MUR 603(78)

Dear Mr. Ramos:

On September 20,1978, the Commission determined there is reasonable cause to believe that Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended, by making a contribution to candidate Jim Madrid which, in the aggregate, exceeded $1,000.

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

If you intend to comply with the terms of the enclosed agreement, please sign and return it to the Commission along with the civil penatly, within thirty (30) days. If you have any questions, please contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7 9 0 4 0 1 2 1 1 4 8

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

SHS
9/21/78

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd.
North Hollywood, CA 91601

Re: MUR 603(78)

Dear Mr. Ramos:

On September ,1978, the Commission determined there is reasonable cause to believe that Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended, by making a contribution to candidate Jim Madrid which, in the aggregate, exceeded $1,000.

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

If you intend to comply with the terms of the enclosed agreement, please sign and return it to the Commission along with the civil penatly, within thirty (30) days. If you have any questions, please contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7904012149

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	
Ramos Graff and Associates	)	MUR 603(78)

CONCILIATION AGREEMENT

This matter having been initiated on the basis of information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted, and the Commission having found reasonable cause to believe that respondent, Ramos Graff and Associates, violated 2 U.S.C. § 441a(a)(1)(A):

Now, therefore, the respective parties herein, the Federal Election Commission and respondent Ramos Graff and Associates having duly entered into conciliation pursuant to § 437g(a)(5) do hereby agree as follows:

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

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

III. The respondent Ramos Graff and Associates, by absolving candidate Jim Madrid of a $10,937.42 debt not considered in the ordinary course of business, therefore made a $10,937.42 contribution to the campaign.

7 9 0 4 0 1 2 1 1 5 0

Therefore, respondent Ramos Graff and Associates agrees:

I. Respondent's actions in contributing in excess of the limitation is in violation of 2 U.S.C. § 441a(a)(1)(A).

II. Respondent will pay a civil penalty in the amount of $200 pursuant to 2 U.S.C. § 437g(a)(6)(B)(i).

III. Respondent agrees that it will not undertake any activity which is in violation of the Federal Election Campaign Act, 2 U.S.C. § 431, et seq.

GENERAL CONDITIONS

I. The Commission on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matter 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.

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

7 9 0 4 0 1 2 1 1 5 1

III. It is agreed that respondent Ramos Graff and Associates shall have 30 days from the date of this agreement to implement and comply with the requirements contained herein, or to so notify the Commission.

Date	William C. Oldaker General Counsel Federal Election Commission
Date	Salvador M. Ramos Ramos Graff and Associates

7 9 0 4 0 1 2 1 1 5 2

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of	)	
	)	MUR 603 (78)
Committee to Elect Jim Madrid	)	
Ramos Graff and Associates	)	
Henry Aguilar	)	

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on September 20, 1978, the Commission determined by a vote of 6-0 to adopt the recommendation of the General Counsel to take the following actions in the above-captioned matter:

1. Find reasonable cause to believe the Committee to Elect Jim Madrid violated 2 U.S.C. §441a(f).

2. Find reasonable cause to believe Ramos Graff and Associates violated 2 U.S.C. §441a(a)(1)(A).

3. Delay further action with regard to Mr. Aguilar's violation of 2 U.S.C. §441g until his response to the reason to believe notification has been received.

4. Send the letters and conciliation agreements attached to the General Counsel's Report dated September 7, 1978.

Attest:

9/20/78
Date

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

7 9 0 4 0 1 2 1 1 5 5

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

SUBJECT: OBJECTION - MUR 603 - General Counsel's Report dated 9-7-78
Signed 9-8-78
Received in Office of Commission Secretary: 9-8-78, 5:06

DATE: SEPTEMBER 12, 1978

The above-named document was circulated on a 48 hour vote basis at 4:00, September 11, 1978.

Commissioner Staebler submitted an objection at 3:35 this date thereby placing MUR 603 on the Executive Session Agenda for September 20, 1978.

A copy of Commissioner Staebler's vote sheet is attached.

ATTACHEMENT:
Vote Sheet

cc: Commissioner Staebler

7904012154

48 HOUR TALLY SHEET

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

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

78 SEP 12 P 3: 35

Date and Time Transmitted: September 11, 1978 4:

Commissioner Staebler

RETURN TO OFFICE OF COMMISSION SECRETARY BY: September 13, 1978 4:00

MUR No. 603 General Counsel's Report, dated 9-7-78

( ) I approve the recommendation

(X) I object to the recommendation

COMMENTS: WHAT WERE RECEIPTS & EXPENDITURES IN THE CAMPAIGN
WHAT WAS PADRIO'S VOTE AND VOTE %

Date: 9/12/78 Signature: [signature]

THE OFFICE OF GENERAL COUNSEL WILL TAKE NO ACTION IN THIS MATTER UNTIL THE APPROVAL OF FOUR COMMISSIONERS IS RECEIVED. PLEASE RETURN ALL PAPERS NO LATER THAN THE DATE AND TIME SHOWN ABOVE TO THE OFFICE OF COMMISSION SECRETARY. ONE OBJECTION PLACES THE ITEM ON THE EXECUTIVE SESSION AGENDA.

7904012115 5

September 8, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 603

Please have the attached General Counsel's Report on MUR 603 distributed to the Commission on a 48 hour tally basis.

Thank you.

7904012156

BEFORE THE FEDERAL ELECTION COMMISSION

SEPTEMBER 7, 1978

In the Matter of	)	
	)	
Committee to Elect Jim Madrid	)	MUR 603(78)
Ramos Graff and Associates	)	
Henry Aguilar	)	

GENERAL COUNSEL'S REPORT

Background

On June 14, 1978, the Commission determined there was reason to believe that 1) the Committee to Elect Jim Madrid violated 2 U.S.C. § 441a(f), 2) Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A), and 3) Henry Aguilar violated 2 U.S.C. § 441g. The details of this matter are set forth in the First General Counsel's Report circulated to the Commission on June 12, 1978.

Evidence

On June 26, 1978, the Office of General Counsel received a response to its reason to believe notification from Jim Madrid. (See Attachment A). In the letter, Mr. Madrid claims that the public relations firm of Ramos Graff and Associates "...originally assumed full responsibility for the campaign..." and therefore, he could not be held liable for any violation of the Federal Election Campaign Act. He states further that he "did not at any time agree to pay any one or organization for any participation in the campaign." It should be noted that Mr. Madrid never made any overt attempt to withdraw from the race.

7904012157

A response from Ramos Graff and Associates was received by the Office of General Counsel on July 10, 1978. (See Attachment B). In the letter, Mr. Ramos states that in regard to paying people for campaign work done on behalf of Mr. Madrid, "...Mr. Ramos would fulfill the obligation thinking he would be reimbursed by the Committee (to Elect Jim Madrid)". However, the letter goes on to state the Committee had no funds with which to reimburse Mr. Ramos. On April 5, 1978, Ramos sent a letter to the FEC stating that "In order to assist Mr. James Madrid to close out his account with the FEC, Ramos Graff and Associates...do hereby absolve Mr. Madrid of any debt related to his political campaign." Mr. Ramos states in his letter to the Commission of July 10th, that if forgiving the debt places Ramos Graff and Associates in violation of 2 U.S.C. § 441a(a)(1)(A), they will pursue collection of the $10,937.42 owed them.

A reason to believe notification was sent to the third respondent in this matter, Mr. Henry Aguilar, on June 15, 1978. The letter was returned with a notice that the forwarding order had expired. On July 31, 1978, the Office of General Counsel obtained another address for Mr. Aguilar and has sent the reason to believe notification to this second address. We have contacted his son and hope for a response shortly.

Recommendation

We recommend the Commission:

1) determine that there is reasonable cause to believe the Committee to Elect Jim Madrid violated 2 U.S.C. § 441a(f).

7 9 0 4 0 1 2 1 1 5 8

2) determine that there is reasonable cause to believe Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A).

3) delay further action with regard to Mr. Aguilar's violation of 2 U.S.C. § 441g until his response to the reason to believe notification has been received.

4) Send the attached letters and conciliation agreements

9/8/78
Date

William C. Oldaker
General Counsel

Packet Contains:
1. G. C. Report
2. Attachment A
3. Attachment B
4. Ltr to Mr. S. M. Ramos
5. Conciliation Agreement
6. Ltr to Mr.M. Duncan
7. Conciliation Agreement
8. Certification

7904012115 9

Seyforth/Weissenberg

DOC 3929

FEDERAL ELECTION COMMISSION

'78 JUN 26 PM 12:35

JUNE 20,1978.

ATTACHMENT A

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: MUR 603(78).

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

803942

WILLIAM C. OLDAKER
GENERAL COUNSEL

DEAR SIR:

IN WHAT STARTED TO BE AN ASSISTANCE TO RECONCILE AND CLOSE THE CAMPAIGN ISSUE, YOU NOW THREATEN TO TAKE AN ACTION. I HAVE COOPERATED COMPLETLY AND WITHOUT ANY MALICE, AND SURELY HONESTLY, WITH YOUR ORIGINAL REQUEST AND ALL SUBSEQUENT DEMANDS. I HAVE FURNISHED ALL RECORDS, FORMS, INFORMATION, TO BRING THIS CASE TO A COMPLETE CLOSE, SO WAS I INFORMED.

I READ IN YOUR RECENT NOTICE THAT AN ACTION IS DUE, FROM YOUR DECISION OF ALL THAT I HAVE SUBMITTED TO YOU AND THAT I HAVE AN ALTERNATIVE TO SECURE LEGAL COUNSER. I, AM NOT ABLE OR IN A POSITION FINANCIALLY TO COMPENSATE ANY ONE, OR LEGAL COUNSEL; FOR ANY ACTION YOU MAY IMPLY. I HAVE FAITHFULLY COMPLIED WITH YOUR REPRESENTATIVES TO FINALIZE AND CLOSE THIS CASE AND, ANY FURTHER CONTACT, I WAS ADVISED WHAT TO DO AND RELIED ON THE HONESTY AND MOTIVES OF THOSE YOU PUT IN CHARGE TO ASSIST ME. I HAVE COMPLIED WITH ALL REQUESTS AND HAVE DONE ALL THAT IS WITHIN MY RECORDS AND COOPERATIONWITH YOUR DEPARTMENT.

ANY FURTHER DEMANDS, I RECOMMEND, YOU DIRECTLY CONTACT THE P.R. FIRM RAMOS AND GRAFF ASSOCIATES WHO ORIGINALLY ASSUMED FULL RESPONSIBILITY FOR THE CAMPAIGN AN ALSO THEIR APPOINTMENTS OF OFFICERS.

I, DID NOT AT ANY TIME AGREE TO PAY ANY ONE OR ORGANIZATION FOR ANY PARTICIPATION IN THE CAMPAIGN. ASSUREDLY, BECAUSE I AM NOT, AND NEVER WAS IN A FINANCIAL POSITION TO ASSUME THAT RESPONSIBILITY.

RESPECTFULLY,

Jim Madrid.

JIM MADRID

7904012160

804307

RAMOS GRAFF & ASSOCIATES

10644 NORTH MAGNOLIA BOULEVARD NORTH HOLLYWOOD, CALIFORNIA 91601

343-6296 — 980-0340

ATTACHMENT B

July 5, 1978

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

Attention: Susan Seyforth

Gentlemen:

I am in receipt of a letter from Mr. Wm. C. Oldaker of June 15, 1978, relative to the Commission's reason to believe Ramos Graff and Associates violated specific laws during the Madrid for Congress Campaign in California during 1976.

Ramos Graff and Associates never contributed one penny as a donation to the Jim Madrid Campaign. In the course of creating financial obligations where Mr. Ramos employed people for the purpose of phoning, addressing and doing all the other functions of a campaign, a situation developed where people expected their pay upon completion of a job. As Mr. Ramos was the one they looked to for payment, Mr. Ramos would fulfill the obligation thinking he would be reimbursed by the Committee. As things happened, Mr. Ramos was never reimbursed because there was no money in the treasury. If, now, by forgiving the debt Ramos Graff and Associates fall into a category of violating 2 U.S.C. S 44 a(a) then the letter to the FEC of April 5, 1978 will be rescinded and they will pursue collection.

Mr. Madrid has no intention of paying this debt nor is Ramos Graff and Associates too keen about pursuing collection through civil action. The entire campaign was a sad experience. Early in the campaign Mr. Madrid was beset with personal family problems and it was most difficult for him to portray the part of a campaigner. Upon termination of the campaign there was no money to reimburse anyone. Everyone disappeared and not until the letter of March 2, 1978, from Mr. Robert J. Costa was Ramos Graff and Associates aware of the mess the original treasurer had left the Committee. Mrs. Graff contacted Mr. Kevin McFadden of the FEC and based on his

7904012116 1

directions, Mr. Ramos wrote a letter to Mr. Madrid on April 5, 1978 (copy to the FEC) and additive to that letter, through the advice of your office by letter, he forgave the debt.

Mr. Ramos, the Campaign Manager, only met the responsibilities of financial obligation incurred for services to the Committee; services which were ultimately not repayed. Ramos Graff and Associates are victims of a situation -- nobody gave monies with intention of personal gains and certainly Ramos Graff and Associates were not in a position to voluntarily donate any money whatsoever. The monies owed are all for payment of services given the Committee. It may also be noted that these losses were not listed as business income deductions on tax reports by Ramos Graff and Associates or personally by Mrs. Graff or Mr. Ramos, as donations or losses.

Very truly yours,

S. M. RAMOS

SMR/rn

7 9 0 4 0 1 2 1 1 6 2

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd.
North Hollywood, CA 91601

Re: MUR 603(78)

Dear Mr. Ramos:

On September ,1978, the Commission determined there is reasonable cause to believe that Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended, by making a contribution to candidate Jim Madrid which, in the aggregate, exceeded $1,000.

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

If you intend to comply with the terms of the enclosed agreement, please sign and return it to the Commission along with the civil penatly, within thirty (30) days. If you have any questions, please contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7904012163

FEDERAL ELECTION COMMISSION

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Melford Duncan, Treasurer
Committee to Elect Jim Madrid
c/o Jim Madrid
Compressor Equipment
1933 San Fernando Road
Los Angeles, CA 90065

Re: MUR 603(78)

Dear Mr. Duncan:

On September ,1978, the Commission determined there is reasonable cause to believe that the Committee to Elect Jim Madrid violated 2 U.S.C. § 441a(f) by accepting a contribution which, in the aggregate, exceeded $1,000.

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

If you decide to comply with the terms of the enclosed agreement, please sign and return it to the Commission along with the civil penalty within thirty (30) days. If you have any questions, please do not hesitate to contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

7 9 0 4 0 1 2 1 1 6 4

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

August 18, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry V. Aguilar
2570 E. Orange Grove Avenue
Pasadena, California

Re: MUR 603(78)

Dear Mr. Aguilar:

Enclosed please find a copy of a notification we attempted to send to you in care of Emiliano's restaurant on June 15, and to your son's address on August 3.

Susan Seyfarth of our staff spoke with your son on August 10 and he informed us of your correct address.

Your prompt response to this notice will be greatly appreciated.

Sincerely,

William C. Oldaker
General Counsel

Enclosure

SS 603

7904012163

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

August 3, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry Aguilar
832 Highland Drive
East Los Angeles
California 91011

Re: MUR 603(78)

Dear Mr. Aguilar:

Enclosed please find a copy of a notification we attempted to send you in care of your restaurant on June 15, 1978. The letter was returned with a notice that the forwarding order had expired.

Your prompt response to this notice will be greatly appreciated.

Sincerely,

William C. Oldaker

Enclosur

MUR 603 Supports

PS Form 3811 Mar. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:
Henry Aguilar
832 Highland Drive
E. Los Angeles, Calif. 91011

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
[illegible]

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
8-8-78

5. ADDRESS (complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK
AUG 8 1978

CLERK'S INITIALS

GPO 1977-0-249-596

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

MEMORANDUM TO CHARLES STEELE

FROM: MARJORIE W. EMMONS MWE

DATE: JULY 31, 1978

SUBJECT: MUR 603 - Interim Status Report
Dated: July 26, 1978
Received by Office of Commission
Secretary: 7-28-78, 11:40

The above-named document was circulated on a 24 hour no-objection basis at 3:00 p.m. on July 28, 1978.

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

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

7904012167

July 28, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 603

Please have the attached Interim Status Report on MUR6603 distributed to the Commission.

Thank you.

7904021168

BEFORE THE FEDERAL ELECTION COMMISSION
July 26, 1978

In the Matter of	)	
	)	
Committee to Elect Jim Madrid	)	MUR 603(78)
Ramos Graff and Associates	)	
Henry Aguilar	)	

INTERIM STATUS REPORT

On June 14, 1978, the Commission determined there is reason to believe that 1) the Committee to Elect Jim Madrid violated 2 U.S.C. §441a(f), 2) Ramos Graff and Associates violated 2 U.S.C. §441a(a)(1)(A), and 3) Mr. Henry Aguilar violated 2 U.S.C. §441g of the Federal Election Campaign Act, as amended. The details of this matter are set forth in the First General Counsel's Report circulated to the Commission on June 12, 1978.

Responses to the reason to believe notifications have been received from Jim Madrid and Ramos Graff and Associates. The notification for Mr. Aguilar was returned with a notice that the forwarding order had expired. We are still attempting to locate this respondent.

As soon as the information received is examined, we will submit to the Commission an analysis of the information and a recommendation as to the disposition of this material.

7/28/78
Date

William C. Oldaker
General Counsel

7904012169

804307

RAMOS GRAFF & ASSOCIATES

10644 NORTH MAGNOLIA BOULEVARD NORTH HOLLYWOOD, CALIFORNIA 91601

343-6296 — 980-0340

July 5, 1978

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

Attention: Susan Seyforth

Gentlemen:

I am in receipt of a letter from Mr. Wm. C. Oldaker of June 15, 1978, relative to the Commission's reason to believe Ramos Graff and Associates violated specific laws during the Madrid for Congress Campaign in California during 1976.

Ramos Graff and Associates never contributed one penny as a donation to the Jim Madrid Campaign. In the course of creating financial obligations where Mr. Ramos employed people for the purpose of phoning, addressing and doing all the other functions of a campaign, a situation developed where people expected their pay upon completion of a job. As Mr. Ramos was the one they looked to for payment, Mr. Ramos would fulfill the obligation thinking he would be reimbursed by the Committee. As things happened, Mr. Ramos was never reimbursed because there was no money in the treasury. If, now, by forgiving the debt Ramos Graff and Associates fall into a category of violating 2 U.S.C. S 44 a(a) then the letter to the FEC of April 5, 1978 will be rescinded and they will pursue collection.

Mr. Madrid has no intention of paying this debt nor is Ramos Graff and Associates too keen about pursuing collection through civil action. The entire campaign was a sad experience. Early in the campaign Mr. Madrid was beset with personal family problems and it was most difficult for him to portray the part of a campaigner. Upon termination of the campaign there was no money to reimburse anyone. Everyone disappeared and not until the letter of March 2, 1978, from Mr. Robert J. Costa was Ramos Graff and Associates aware of the mess the original treasurer had left the Committee. Mrs. Graff contacted Mr. Kevin McFadden of the FEC and based on his

7904012170

directions, Mr. Ramos wrote a letter to Mr. Madrid on April 5, 1978 (copy to the FEC) and additive to that letter, through the advice of your office by letter, he forgave the debt.

Mr. Ramos, the Campaign Manager, only met the responsibilities of financial obligation incurred for services to the Committee; services which were ultimately not repayed. Ramos Graff and Associates are victims of a situation -- nobody gave monies with intention of personal gains and certainly Ramos Graff and Associates were not in a position to voluntarily donate any money whatsoever. The monies owed are all for payment of services given the Committee. It may also be noted that these losses were not listed as business income deductions on tax reports by Ramos Graff and Associates or personally by Mrs. Graff or Mr. Ramos, as donations or losses.

Very truly yours,

S. M. RAMOS

SMR/rn

7904012117 1

MADRID
DIDATE FOR CONGRESS
North Main Street
Angeles, California 90012

7 9 0 4 0 1 2 1
FEDERAL ELECTION COMMISSION
'78 JUL 10 AM 9:42

VAN NUYS, CA
PM
7 JUL
1978

FEDERAL ELECTION COMMISSION

1325 "K" Street, N.W.

Washington, D.C. 20463

ATTENTION: Susan Seyforth

MUR 603

GCC

RECEIVED
FEDERAL ELECTION
COMMISSION

'78 JUN 26 PM 12:35

JUNE 20,1978.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

RE: MUR 603(78).

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

803942

WILLIAM C. OLDAKER
GENERAL COUNSEL

DEAR SIR:

IN WHAT STARTED TO BE AN ASSISTANCE TO RECONCILE AND CLOSE THE CAMPAIGN ISSUE, YOU NOW THREATEN TO TAKE AN ACTION.
I HAVE COOPERATED COMPLETLY AND WITHOUT ANY MALICE, AND SURELY HONESTLY, WITH YOUR ORIGINAL REQUEST AND ALL SUBSEQUENT DEMANDS.
I HAVE FURNISHED ALL RECORDS, FORMS, INFORMATION, TO BRING THIS CASE TO A COMPLETE CLOSE, SO WAS I INFORMED.

I READ IN YOUR RECENT NOTICE THAT AN ACTION IS DUE, FROM YOUR DECISION OF ALL THAT I HAVE SUBMITTED TO YOU AND THAT I HAVE AN ALTERNATIVE TO SECURE LEGAL COUNSEL. I, AM NOT ABLE OR IN A POSITION FINANCIALLY TO COMPENSATE ANY ONE, OR LEGAL COUNSEL, FOR ANY ACTION YOU MAY IMPLY. I HAVE FAITHFULLY COMPLIED WITH YOUR REPRESENTATIVES TO FINALIZE AND CLOSE THIS CASE AND ANY FURTHER CONTACT, I WAS ADVISED WHAT TO DO AND RELIED ON THE HONESTY AND MOTIVES OF THOSE YOU PUT IN CHARGE TO ASSIST ME.
I HAVE COMPLIED WITH ALL REQUESTS AND HAVE DONE ALL THAT IS WITHIN MY RECORDS AND COOPERATIONWITH YOUR DEPARTMENT.

ANY FURTHER DEMANDS, I RECOMMEND, YOU DIRECTLY CONTACT THE P.R. FIRM RAMOS AND GRAFF ASSOCIATES WHO ORIGINALLY ASSUMED FULL RESPONSIBILITY FOR THE CAMPAIGN AN ALSO THEIR APPOINTMENTS OF OFFICERS.
I, DID NOT AT ANY TIME AGREE TO PAY ANY ONE OR ORGANIZATION FOR ANY PARTICIPATION IN THE CAMPAIGN. ASSUREDLY, BECAUSE I AM NOT, AND NEVER WAS IN A FINANCIAL POSITION TO ASSUME THAT RESPONSIBILITY.

RESPECTFULLY,

Jim Madrid.

JIM MADRID

7904012173

JIM MADRID
647 ISABEL ST.
L.A. CALIF. 90065.

RECEIVED
FEDERAL ELECTION
COMMISSION
LOS ANGELES
JUN 21 '78
CA

U.S. POSTAGE
$1.40

'78 JUN 26 PM 12:35

CERTIFIED
No. 647674
MAIL

FEDERAL ELECTION COMMISSION

1325 K STREET N.W.

WASHINGTON, D.C. 20463.

SUSAN SEYFARTH (202)
MUR 603 (78)

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

June 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry Aguilar
c/o Emiliano's Restaurant
78 W. Colorado Road
Pasadena, California 91100

Re: MUR 603(78)

Dear Mr. Aguilar:

This is to notify you that the Federal Election Commission has determined it has reason to believe that you violated 2 U.S.C. § 441g of the Federal Election Campaign Act of 1971, as amended.

2 U.S.C. § 441g prohibits anyone from "making contributions of currency to or for the benefit of any candidate which, in the aggregate, exceed $100..." On June 7, 1976, the Committee to Elect Jim Madrid deposited a third party check for $1,000 drawn on a corporate account from you, which was returned by the bank due to insufficient funds. A few days later, in lieu of re-depositing that check, the Committee accepted $1,000 in cash from you, placing you in violation of 2 U.S.C. § 441g.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Any materials should be submitted within ten (10) days of your receipt of this letter. They will be considered prior to any further action by the Commission.

If you intend to be represented by counsel, please notify the Commission in writing.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) until the matter is finally resolved, unless you state to the Commission in writing that you wish the investigation to be made public. If you have any questions, please do not hesitate to contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter. We have numbered this Matter Under Review "MUR 603(78)". Please refer to this number in all future correspondence.

Sincerely,

William C. Oldaker
General Counsel

9 0 4 0 1 2 1 1 7

AW 403

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:

Henry Aguilar

3. ARTICLE DESCRIPTION:

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	94828	

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY | POSTMARK

5. ADDRESS (Complete only if requested)

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

☆ GPO : 1977—O-234-337

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

POSTAGE AND FEES PAID

U.S.MAIL

Forward order expired

RETURNED TO SENDER

ADDRESSEE UNKNOWN

Mr. Henry Aguilar
c/o Emiliano's Restaurant
78 W. Colorado Road
Pasadena, California 91100

CERTIFIED

943235

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

AMERICAN REVOLUTION BICENTENNIAL 1776-1976

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

June 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry Aguilar
c/o Emiliano's Restaurant
78 W. Colorado Road
Pasadena, California 91100

Re: MUR 603(78)

Dear Mr. Aguilar:

This is to notify you that the Federal Election Commission has determined it has reason to believe that you violated 2 U.S.C. § 441g of the Federal Election Campaign Act of 1971, as amended.

2 U.S.C. § 441g prohibits anyone from "making contributions of currency to or for the benefit of any candidate which, in the aggregate, exceed $100..." On June 7, 1976, the Committee to Elect Jim Madrid deposited a third party check for $1,000 drawn on a corporate account from you, which was returned by the bank due to insufficient funds. A few days later, in lieu of re-depositing that check, the Committee accepted $1,000 in cash from you, placing you in violation of 2 U.S.C. § 441g.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Any materials should be submitted within ten (10) days of your receipt of this letter. They will be considered prior to any further action by the Commission.

If you intend to be represented by counsel, please notify the Commission in writing.

7904012179

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) until the matter is finally resolved, unless you state to the Commission in writing that you wish the investigation to be made public. If you have any questions, please do not hesitate to contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter. We have numbered this Matter Under Review "MUR 603(78)". Please refer to this number in all future correspondence.

Sincerely,

William C. Oldaker
General Counsel

7904012130

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

June 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd.
North Hollywood, CA 91601

Re: MUR 603(78)

Dear Mr. Ramos:

This is to notify you that the Federal Election Commission has determined that it has reason to believe Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended.

2 U.S.C. § 441a(a)(1)(A) prohibits anyone from making contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000. On its termination report, the Committee to Elect Jim Madrid reported an outstanding debt of $10,937.42 owed to your firm. Subsequently, the Committee provided the Commission with a letter you wrote dated April 5, 1978, forgiving the debt. Although Ramos Graff and Associates is not incorporated, and although the Commission has determined that in certain circumstances debts owed unincorporated businesses may be forgiven in the same manner as are those owed incorporated entities, the debt owed your firm apparently does not meet the Commission's criteria for permitting forgiveness. The debt was apparently not incurred in connection with goods or services rendered by a vendor in the ordinary course of business. Rather, the debt involved the lending of money to the Committee by a business entity, the principals of which were directly involved in the Jim Madrid campaign. As a result, your forgiveness of the debt in fact constitutes a contribution of $10,937.42 from Ramos Graff and Associates in violation of 2 U.S.C. § 441a(a)(1)(A).

7904012118

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Any materials should be submitted within ten (10) days of your receipt of this letter. They will be considered prior to any further action by the Commission.

If you intend to be represented by counsel in this matter, please notify the Commission in writing.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) until the matter is resolved, unless you state to the Commission in writing that you wish the investigation to be made public. If you have any questions, please do not hesitate to contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter. We have numbered this Matter Under Review "MUR 603(78)". Please refer to this number in all future correspondence.

Sincerely,

William C. Oldaker
General Counsel

AW 603

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO:
Salvador M. Ramos

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. 94836 | INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

POSTMARK NORTH HOLLYWOOD, CA CARRIER ANNEX JUN 26 1978

☆ GPO : 1977—O-234-337

7904012118

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

June 15, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Melford Duncan, Treasurer
Committee to Elect Jim Madrid
c/o Mr. Jim Madrid
Compressor Equipment
1933 San Fernando Road
Los Angeles, CA 90065

Re: MUR 603(78)

Dear Mr. Duncan:

This is to notify you that the Federal Election Commission has determined it has reason to believe that the Committee to Elect Jim Madrid violated Section 441a(f) of the Federal Election Campaign Act of 1971, as amended.

2 U.S.C. § 441a(f) prohibits candidates or political committees from knowingly accepting a contribution which, in the aggregate, exceeds $1,000. On your committee's termination report, you reported an outstanding debt of $10,937.42 owed to Ramos Graff and Associates. Subsequently, you provided the Commission with a letter from Ramos Graff and Associates forgiving the debt. Although Ramos Graff and Associates is not incorporated, and although the Commission has determined that in certain circumstances debts owed unincorporated businesses may be forgiven in the same manner as are those owed incorporated entities, the debt owed Ramos Graff apparently does not meet the Commission's criteria for permitting forgiveness. The debt was apparently not incurred in connection with goods or services rendered by a vendor in the ordinary course of business. Rather, the debt involved the lending of money to your Committee by a business entity, the principals of which were directly involved in your campaign. As a result,

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the forgivenness of the debt on the part of Ramos Graff and Associates in fact constitutes a contribution of $10,937.42 from Ramos Graff. The Committee is in apparent violation of 2 U.S.C. §441a(f) for having accepted this excessive contribution.

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

Any materials should be submitted within ten (10) days of your receipt of this letter. They will be considered prior to any further action by the Commission.

If you intend to be represented by counsel in this matter, please notify the Commission in writing.

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Sincerely,

William C. Oldaker
General Counsel

HW 603

PS Form 3811, Apr. 1977 — RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

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

2. ARTICLE ADDRESSED TO: Melford Duncan

3. ARTICLE DESCRIPTION: REGISTERED NO. | CERTIFIED NO. 943007 | INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 6-15-78

POSTMARK JUN 1978 LOS ANGELES CA

5. ADDRESS (Complete only if requested) 1933 Ala Pl Long Beach LA, CA 90014

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

7904012184

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of Committee to Elect Jim Madrid Ramos Graff and Associates Henry Aguilar	)	MUR 603 (78)

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on June 14, 1978, the Commission approved by a vote of 4-0 the recommendations in the First General Counsel's Report to take the following actions in the above-captioned matter:

1. Find reason to believe that the Committee to Elect Jim Madrid violated 2 U.S.C. §441a(f).

2. Find reason to believe that Ramos Graff and Associates violated 2 U.S.C. §441a(a)(1)(A).

3. Find reason to believe that Mr. Henry Aguilar violated 2 U.S.C. §441g.

4. Send the letters attached to the First General Counsel's Report.

Commissioners Harris and Tiernan were not present at the time of the vote.

Marjorie W. Emmons

Date: 6/14/78

Marjorie W. Emmons
Secretary to the Commission

First General Counsel's Report undated
Received in Office of Commission Secretary: 6- 9-78, 3:44
Circulated on 48 hour vote basis: 6-12-78, 2:00

7904021185

June 9, 1978

MEMORANDUM TO: Marge Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 603

Please have the attached 7 day report on MUR 603 distributed to the Commission on a 48 hour tally basis.

Thank you.

7904012118 6

FEDERAL ELECTION COMMISSION

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO COMMISSION _____

MUR NO. 603
STAFF MEMBER(S) _____

Weissenborn/Seyfarth

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Committee to Elect Jim Madrid
Ramos Graff and Associates
Henry Aguilar

RELEVANT STATUTE: 2 U.S.C. § 441g;
2 U.S.C. § 441a(a)(1)(A)
2 U.S.C. § 441a(f)

INTERNAL REPORTS CHECKED: Reports Analysis
Audit Division

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel by the Audit Division as a result of a random audit of the Respondent Committee. (See Attachment I.)

SUMMARY OF ALLEGATIONS

The audit of the Committee to Elect Jim Madrid (hereinafter "the Committee") has revealed that 1) Mr. Henry Aguilar made a $1,000 cash contribution to the Committee in violation of 2 U.S.C. §441g, 2) the Committee accepted a contribution in excess of $1,000 from the public relations firm of Ramos Graff and Associates in violation of 2 U.S.C. §441a(f), and 3) Ramos Graff and Associates violated 2 U.S.C. §441a(a)(1)(A) by making a contribution in excess of $1,000 to the Committee.

PRELIMINARY LEGAL ANALYSIS

2 U.S.C. §441g prohibits anyone from "making contributions of currency to or for the benefit of any candidate which, in the aggregate, exceed $100..." On June 7, 1976, the Committee deposited a third party check for $1,000 drawn on a corporate account which had been received from Mr. Henry Aguilar and which was returned by the bank due to insufficient funds. A few days later, in lieu of redepositing that check, the Committee accepted $1,000 in cash from Mr. Aguilar. Such a contribution places Mr. Aguilar in violation of 2 U.S.C. §441g.

7904012187

2 U.S.C. §441a(a)(1)(A) prohibits anyone from making "a contribution to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceeds $1,000." On its termination report, the Committee included an outstanding debt of $10,937.42 owed to Ramos Graff and Associates, a public relations firm. Subsequently, the Commission received a letter from Ramos Graff and Associates forgiving the debt.

Although Ramos Graff and Associates is not incorporated, and although the Commission has determined that in certain circumstances debts owed unincorporated businesses may be forgiven in the same manner as are those owed incorporated entities, the dept owed Ramos Graff and Associates apparently does not meet the Commission's criteria for permitting forgiveness. The debt was not incurred in connection with goods or services rendered by a vendor in the ordinary course of business. Rather, the debt involved the making of expenditures and the rendering of services for the Committee by a business entity the principals of which were directly involved in the campaign in question. (It is our understanding that this involvement began with encouragement of the Candidate to run in the first place.) As a result, the forgiveness of the debt on the part of Ramos Graff and Associates in fact constitutes a contribution of $10,937.42 from Ramos Graff and Associates, placing the firm in violation of 2 U.S.C. § 441a(a)(1)(A). The Committee is in apparent violation of 2 U.S.C. § 441a(f) for having accepted this excessive contribution.

RECOMMENDATION

1. Find reason to believe that the Committe to Elect Jim Madrid violated 2 U.S.C. § 441a(f).

2. Find reason to believe that Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A).

3. Find reason to believe that Mr. Henry Aguilar violated 2 U.S.C. § 441g.

4. Send the attached letters.

7904012188

Attachment I
Browning
A-250

5-15
MUR 603
JB

FEDERAL ELECTION COMMISSION

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

May 10, 1978

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER OBP 34155

FROM: BOB COSTA/KEVIN MCFADDEN RJC KPM

SUBJECT: EXCESSIVE CONTRIBUTIONS RECEIVED BY THE COMMITTEE TO ELECT JIM MADRID

During the recent audit of the Committee to Elect Jim Madrid, candidate for Congress from the 25th Congressional District of California who was involved in the 1976 primary and general elections, the Audit staff noted the following matters:

Excessive Cash Contribution

Section 441g of Title 2, United States Code, provides in part, that no person shall make contributions of currency to or for the benefit of any candidate which, in the aggregate, exceed $100, with respect to any campaign of such candidate for nomination for election, or for election, to Federal office.

Section 110.4(c)(2) of Title 11, Code of Federal Regulations, in part, requires a candidate or committee receiving a cash contribution in excess of $100 to promptly return the amount in excess of $100 to the contributor.

Section 441b(a) of Title 2, United States Code, in part, prohibits any corporation from making a contribution in connection with any Federal election and prohibits any candidate or political committee from accepting any contribution from a corporation.

Our review of the contribution records disclosed that the Committee deposited a third party check drawn on a corporate account for $1,000 on June 7, 1976, which was returned by the bank due to insufficient funds. On June 11, 1976, the Committee deposited $1,000 in currency from the same contributor. The Candidate stated that he thought that the third party check drawn on a corporate account constituted a corporate contribution that could not be accepted; therefore, he advised the contributor that he could not accept the check, but could accept

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$1,000 in cash. The Candidate stated that he was not aware of the prohibition in the Act or the requirement of the Commission's Regulations regarding excessive contributions of currency.

During the audit and in our letter of findings and recommendations, we advised the Candidate/Committee that the portion of the cash contribution in excess of $100 should be refunded. Responding to our letter of audit findings and recommendations, the Candidate informed us that he was unable to locate the contributor to make a refund of the excess contribution.

Contribution-in-Kind in Excess of Limit

Section 441a(a)(1)(A) of Title 2, United States Code prohibits a person from making contributions to any candidate and his authorized political committees with respect to any election for Federal office, which in the aggregate, exceed $1,000. Section 431(e)(1)(A) defines a contribution as anything of value made for the purpose of influencing the nomination for election, or election of any person to Federal office.

Our review disclosed the Committee had reported on its termination report, filed on January 20, 1977, an outstanding debt owed to Ramos Graff & Associates in the amount of $10,937.42. The review of the Committee's records confirmed the amount of the debt. However, in response to our letter of findings and recommendations, the Committee furnished the Audit staff with a letter from Ramos Graff & Associates forgiving the debt. An inquiry to the Secretary of State of California indicated that Ramos Graff & Associates was not incorporated. Other than Pricilla Graff and Salvador Ramos, we are not aware of any other partners.

Recommendation

We recommend that the Office of General Counsel provide the Audit Division with a legal analysis of the excessive contributions noted above so that an audit report can be forwarded to the Commission.

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Attachment 2

RAMOS GRAFF & ASSOCIATES

10844 NORTH MAGNOLIA BOULEVARD NORTH HOLLYWOOD, CALIFORNIA 91601

343-6296 — 980-0340

801686

April 5, 1978

FEDERAL ELECTION COMMISSION
1325 "K" Street, N.W.
Washington, D.C. 20461

Subject: Committee to Elect Jim Madrid

Gentlemen:

In order to assist Mr. James Madrid to close out his account with the Federal Election Commission, RAMOS GRAFF & ASSOCIATES, a public relations firm of Los Angeles, California, do hereby absolve Mr. Madrid of any debt related to his political campaign.

Shortly after June, Mr. Madrid was beset with personal family problems and his candidacy for Congress was not viable. At this date, he has expressed no intent to repay the firm of RAMOS GRAFF & ASSOCIATES and rather than pursuing legal action and ultimate discord in a relationship of long standing, we wish to withdraw our claims for monies owed.

Thanking you for any courtesies extended, I remain,

Yours truly,

SALVADOR M. RAMOS

SMR/rn

7904012191

RAMOS GRAFF & ASSOCIATES

10644 NORTH MAGNOLIA BOULEVARD NORTH HOLLYWOOD, CALIFORNIA 91601

343-6296 — 980-0340

'78 APR 10 PM 1:53

April 5, 1978

Mr. Jim Madrid
COMPRESSOR EQUIPMENT
1933 San Fernando Road
Los Angeles, California 90065

Dear Mr. Madrid:

I am annoyed. We should have gotten together much before now to settle the "Jim Madrid Campaign", but I was negligent in doing this because my experience with you has been that whenever matters of urgency and need arose, nothing was reached as a conclusion.

The problems we are experiencing today with the FEC is exactly what I foresaw early in the campaign when I urged you to get rid of Charles Cook as your Treasurer and get an active political CPA to work with us. Your answer was always related to the issue that CPA's cost money and where could we get one to work for free. Mr. Cook never established guidelines, finance procedures or even made himself available to me to discuss urgent matters such as the entry of the check from Mr. Aguilar.

A few weeks ago I received a phone call from you. The conclusion of that conversation was that I would call you the following Monday after talking to Pat Graff. I spoke with Pat and then I tried to get back to you. You were out of town or something. In any event, I could not reach you. A couple of days later I received a phone message which read: "URGENT AND IMPORTANT YOU CALL ME, WASHINGTON IS MAD AND SERIOUS. DO NOT CALL BEFORE WEDNESDAY, AFTER 9 AM." Now, Jim, in my world, Urgent and Important is NOW! Not a day or two later and at a convenient time. I ignored the call. Two days later I got a call from Pat, who said she had spoken to you. She also called Mr. McFadden in Washington and she spelled out the problems in closing out the "Jim Madrid for Congress" account in accordance with the letter to Mr. Duncan of March 2, 1978.

Mr. Melford Duncan fell heir to the Treasurer's job as a favor to Pat, since you could not produce a Treasurer. He certainly cannot be held responsible for any reports or activities during the period that Mr. Cook represented himself as your Treasurer. As of now, Mr. Duncan, to the best of my knowledge, has changed jobs and cannot be reached readily. At this particular moment he is unobtainable.

7904012192

The letter from the FEC is clear, defined and directed in helping you close out your account. Due to my poor health, I have tried to stay away from pressures or confrontations, but after being briefed by Pat, I have got to jump in and see if you can close this matter with truths and facts.

REFERENCE: Letter to Mr. Melford Duncan, Sr., Treasurer,
COMMITTEE TO ELECT JIM MADRID

FROM: ROBERT J. COSTA
Assistant Staff Director
Audit Division

DATE: March 2, 1978

PAGE 2. SEC. B EXCESSIVE CASH CONTRIBUTIONS AND CORPORATE CONTRIBUTIONS.

The donation in question is the $1,000.00 donated by Mr. Henry Aguilar. Since Mr. Aguilar has seemingly disappeared, we suggest you direct yourself to him by certified mail, return receipt requested, to make contact with him. Explain the situation to him and follow FEC suggestions to correct this matter. If Mr. Aguilar cannot be contacted, then I suggest you contact Mr. McFadden and request further instructions from him.

PAGE 3. SEC. C ITEMIZATION OF TRANSFERS.

The FEC recommends a comprehensive amendment itemizing nine (9) transfers. It is my understanding Mr. McFadden has directed you exactly where to place these on the FEC forms.

PAGE 3. SEC. D RETENTION OF SUPPORTING DOCUMENTATION FOR EXPENDITURES.

A search for all existing materials, such as bills, etc. not handed over to the FEC prior to this date shall be made and all materials will be forwarded to the FEC. Nothing has been discarded.

COMMENT: The obligation I took was to attempt to make you a Congressman. I could not in any manner start the campaign without incurring costs. Also, because of RAMOS and GRAFF's personal reputation, I could not create a debt and not pay it. I paid bills as they became due, hired people as we needed them, created campaign materials and paid the bills because there was no money in the campaign treasury. You nor your Treasurer were around to pay the bills or suggest how to take care of them so that I be released of personal obligation. I thought it simple enough to hand you a RAMOS GRAFF bill and have it honored. Today, I see I should not have done this. I could hand you another bill for the $3,089.38 in question, but then it appears that my bills are also in question because of incollectability. We must look to the FEC for direction in this specific.

7904012193

PAGE 4. SEC. E ITEMIZATION OF EXPENDITURES.

FEC recommends filing an amended report.

PAGE 5. SEC. F DISCLOSURE OF FUND RAISING EVENTS.

All records of all expenditures are either in the hands of the auditors or somewhere in my files. I have thrown nothing away and I believe what has to be done is sort out the bills and place them where they belong. Both fund raisers turned out to be fiascos as far as returns were concerned, but the records of expenditures do exist and can be explained.

PAGE 6. SEC. 434(b) (1) 8 and 11 OVERSTATEMENT OF RECEIPTS, EXPENDITURES AND CASH ON HAND.

Explained in March 2 letter to Mr. Duncan. Amendment requested.

PAGE 6. ITEM H OTHER MATTERS NOT REQUIRING AMENDMENT ACTION.

(1) REPORTING OF CHANGE OF COMMITTEE OFFICIALS.

I personally requested a change in your CPA, Treasurer, Charles Cook the first month of the campaign. My reason was simple. It was obvious Mr. Cook was not going to actively participate in the campaign. Mr. Cook did not establish any procedures nor did he inform me of FEC rules and requirements. I saw Mr. Cook, possibly, five times during the entire campaign. He did not, I repeat, establish guidelines or even make himself available to give direction in the area of accountability. If you recall, Jim, the need for him to relate to us got so bad that we finally insisted on a meeting with him and Pat so that he could give her instructions as to the needs for compliance to the FEC. I am not a bookkeeper and as a matter of fact, I am rather averse and reluctant to the thought of personally sitting down to a chore of adjusting figures. This I recognize as a highly specialized field and profession. I must always look to a professional in this area, the same as I do for my medical and legal needs. I did not have this help from Mr. Cook and that is why I insisted on a replacement. I do not recall a written resignation from Mr. Cook, however, it is a fact that there was a period that the Committee functioned without a Treasurer. I do not recall any contributions coming in during this period. Most of the contributions came in during the primary and to the best of my recollection certainly none after the second fund raiser. There were deposits made, but I do not recall where the money came from.

7904012119 4

(2) SOLICITATIONS AND AUTHORIZATION STATEMENT ON CAMPAIGN LITERATURE.

A print copy was made: "A copy of our report is filed with the FEC and is available for purchase from the FEC, Washington, D.C."

If this statement was not put on all printed material it was a goof on my part. There certainly was no conspiracy to violate this rule. It was ignorance on my part not to insist or to make sure this statement appeared on all donation material to comply with the new Federal laws.

AUDIT FINDINGS AND RECOMMENDATIONS

TERMINATION OF PRINCIPAL CAMPAIGN COMMITTEE

The debt the termination report shows of $10,937.42 dated March 4, 1978 is in the main fees due RAMOS GRAFF & ASSOCIATES for bills paid by them directly related to the debts incurred by the campaign and payment for just a little of their time and effort.

You certainly must agree that no one hires out to work for nothing. It appears I am still working for you for nothing! No one better than you, Jim, knows that no one other than myself gave 100% of his time to the campaign. Not even you. Your efforts were directed from your place of business where I am certain you took care of business as usual. We converted our office to your campaign headquarters. Telephones, rent, campaign materials all became my responsibility. Certainly I never considered I was working for FREE nor that I would not be repaid for the money Pat and I put out for the campaign.

Pat advises me that in her conversation with Mr. McFadden he advises that in order to close out the account we must:

(1) Write a letter absolving the debt;
(2) Pursue collection.

Since there was no written agreement and a very vague arrangement, I will write a letter absolving the debt. I considered the Campaign aborted when personal problems beset your life shortly after the primary. The reality that the entire committee other than Pat and I desisted in campaign participation was heart breaking. I am personally sorry things have turned out as they have, but perhaps now some of the statements I made to you over the years now make sense. Remember -- I told you that the campaign for congress should run about $150,000 and I repeatedly told you that you personally should have 10% because you would be the one held responsible? I thought you understood this and had the erroneous conception that you were prepared to brunt the expenses. Once during the campaign, you spoke of selling a piece of property to produce finances. I do not know what happened. The money never came!

7904012195

There was no cover-up or intent of wrong doing or willful planning. The failure comes in the area of FUND RAISING and ACCOUNTING -- the two areas I advised you we had to have professionals in, other than RAMOS and GRAFF.

Attached I am mailing you a copy of my letter to the FEC.

Salvador Ramos

SR/rn

Encl.

7904012196

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Melford Duncan, Treasurer
Committee to Elect Jim Madrid
c/o Mr. Jim Madrid
Compressor Equipment
1933 San Fernando Road
Los Angeles, CA 90065

Re: MUR 603(78)

Dear Mr. Duncan:

This is to notify you that the Federal Election Commission has determined it has reason to believe that the Committee to Elect Jim Madrid violated Section 441a(f) of the Federal Election Campaign Act of 1971, as amended.

2 U.S.C. § 441a(f) prohibits candidates or political committees from knowingly accepting a contribution which, in the aggregate, exceeds $1,000. On your committee's termination report, you reported an outstanding debt of $10,937.42 owed to Ramos Graff and Associates. Subsequently, you provided the Commission with a letter from Ramos Graff and Associates forgiving the debt. Although Ramos Graff and Associates is not incorporated, and although the Commission has determined that in certain circumstances debts owed unincorporated businesses may be forgiven in the same manner as are those owed incorporated entities, the debt owed Ramos Graff apparently does not meet the Commission's criteria for permitting forgiveness. The debt was apparently not incurred in connection with goods or services rendered by a vendor in the ordinary course of business. Rather, the debt involved the lending of money to your Committee by a business entity, the principals of which were directly involved in your campaign. As a result,

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the forgivenness of the debt on the part of Ramos Graff and Associates in fact constitutes a contribution of $10,937.42 from Ramos Graff. The Committee is in apparent violation of 2 U.S.C. §441a(f) for having accepted this excessive contribution.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's snalysis of this matter.

Any materials should be submitted within ten (10) days of your receipt of this letter. They will be considered prior to any further action by the Commission.

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This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) until the matter is resolved, unless you state to the Commission in writing that you wish the investigation to be made public. If you have any questions, please do not hesitate to contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter. We have numbered this Matter Under Review "MUR 603(78)". Please refer to this number in all future correspondence.

Sincerely,

William C. Oldaker
General Counsel

7904012198

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Salvador M. Ramos
Ramos Graff and Associates
10644 North Magnolia Blvd.
North Hollywood, CA 91601

Re: MUR 603(78)

Dear Mr. Ramos:

This is to notify you that the Federal Election Commission has determined that it has reason to believe Ramos Graff and Associates violated 2 U.S.C. § 441a(a)(1)(A) of the Federal Election Campaign Act of 1971, as amended.

2 U.S.C. § 441a(a)(1)(A) prohibits anyone from making contributions to any candidate and his authorized political committees with respect to any election for Federal office which, in the aggregate, exceed $1,000. On its termination report, the Committee to Elect Jim Madrid reported an outstanding debt of $10,937.42 owed to your firm. Subsequently, the Committee provided the Commission with a letter you wrote dated April 5, 1978, forgiving the debt. Although Ramos Graff and Associates is not incorporated, and although the Commission has determined that in certain circumstances debts owed unincorporated businesses may be forgiven in the same manner as are those owed incorporated entities, the debt owed your firm apparently does not meet the Commission's criteria for permitting forgiveness. The debt was apparently not incurred in connection with goods or services rendered by a vendor in the ordinary course of business. Rather, the debt involved the lending of money to the Committee by a business entity, the principals of which were directly involved in the Jim Madrid campaign. As a result, your forgiveness of the debt in fact constitutes a contribution of $10,937.42 from Ramos Graff and Associates in violation of 2 U.S.C. § 441a(a)(1)(A).

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Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Any materials should be submitted within ten (10) days of your receipt of this letter. They will be considered prior to any further action by the Commission.

If you intend to be represented by counsel in this matter, please notify the Commission in writing.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) until the matter is resolved, unless you state to the Commission in writing that you wish the investigation to be made public. If you have any questions, please do not hesitate to contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter. We have numbered this Matter Under Review "MUR 603(78)". Please refer to this number in all future correspondence.

Sincerely,

William C. Oldaker
General Counsel

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

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Henry Aguilar
c/o Emiliano's Restaurant
78 W. Colorado Blvd.
Pasadena, California 91100

Re: MUR 603(78)

Dear Mr. Aguilar:

This is to notify you that the Federal Election Commission has determined it has reason to believe that you violated 2 U.S.C. § 441g of the Federal Election Campaign Act of 1971, as amended.

2 U.S.C. § 441g prohibits anyone from "making contributions of currency to or for the benefit of any candidate which, in the aggregate, exceed $100..." On June 7, 1976, the Committee to Elect Jim Madrid deposited a third party check for $1,000 drawn on a corporate account from you, which was returned by the bank due to insufficient funds. A few days later, in lieu of re-depositing that check, the Committee accepted $1,000 in cash from you, placing you in violation of 2 U.S.C. § 441g.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter. Any materials should be submitted within ten (10) days of your receipt of this letter. They will be considered prior to any further action by the Commission.

If you intend to be represented by counsel, please notify the Commission in writing.

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This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) until the matter is finally resolved, unless you state to the Commission in writing that you wish the investigation to be made public. If you have any questions, please do not hesitate to contact Susan Seyfarth (202) 523-4175, the staff member assigned to this matter. We have numbered this Matter Under Review "MUR 603(78)". Please refer to this number in all future correspondence.

Sincerely,

William C. Oldaker
General Counsel

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MUR 603

FEDERAL ELECTION COMMISSION

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

May 10, 1978

MEMORANDUM

TO: BILL OLDAKER

THROUGH: ORLANDO B. POTTER OBP

FROM: BOB COSTA/KEVIN MCFADDEN KPM

SUBJECT: EXCESSIVE CONTRIBUTIONS RECEIVED BY THE COMMITTEE TO ELECT JIM MADRID

During the recent audit of the Committee to Elect Jim Madrid, candidate for Congress from the 25th Congressional District of California who was involved in the 1976 primary and general elections, the Audit staff noted the following matters:

Excessive Cash Contribution

Section 441g of Title 2, United States Code, provides in part, that no person shall make contributions of currency to or for the benefit of any candidate which, in the aggregate, exceed $100, with respect to any campaign of such candidate for nomination for election, or for election, to Federal office.

Section 110.4(c)(2) of Title 11, Code of Federal Regulations, in part, requires a candidate or committee receiving a cash contribution in excess of $100 to promptly return the amount in excess of $100 to the contributor.

Section 441b(a) of Title 2, United States Code, in part, prohibits any corporation from making a contribution in connection with any Federal election and prohibits any candidate or political committee from accepting any contribution from a corporation.

Our review of the contribution records disclosed that the Committee deposited a third party check drawn on a corporate account for $1,000 on June 7, 1976, which was returned by the bank due to insufficient funds. On June 11, 1976, the Committee deposited $1,000 in currency from the same contributor. The Candidate stated that he thought that the third party check drawn on a corporate account constituted a corporate contribution that could not be accepted; therefore, he advised the contributor that he could not accept the check, but could accept

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$1,000 in cash. The Candidate stated that he was not aware of the prohibition in the Act or the requirement of the Commission's Regulations regarding excessive contributions of currency.

During the audit and in our letter of findings and recommendations, we advised the Candidate/Committee that the portion of the cash contribution in excess of $100 should be refunded. Responding to our letter of audit findings and recommendations, the Candidate informed us that he was unable to locate the contributor to make a refund of the excess contribution.

Contribution-in-Kind in Excess of Limit

Section 441a(a)(1)(A) of Title 2, United States Code prohibits a person from making contributions to any candidate and his authorized political committees with respect to any election for Federal office, which in the aggregate, exceed $1,000. Section 431(e)(1)(A) defines a contribution as anything of value made for the purpose of influencing the nomination for election, or election of any person to Federal office.

Our review disclosed the Committee had reported on its termination report, filed on January 20, 1977, an outstanding debt owed to Ramos Graff & Associates in the amount of $10,937.42. The review of the Committee's records confirmed the amount of the debt. However, in response to our letter of findings and recommendations, the Committee furnished the Audit staff with a letter from Ramos Graff & Associates forgiving the debt. An inquiry to the Secretary of State of California indicated that Ramos Graff & Associates was not incorporated. Other than Pricilla Graff and Salvador Ramos, we are not aware of any other partners.

Recommendation

We recommend that the Office of General Counsel provide the Audit Division with a legal analysis of the excessive contributions noted above so that an audit report can be forwarded to the Commission.

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FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 603

Date Filmed 4/26/79 Camera No. --- 2

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