

REPORTS ANALYSIS REFERRAL

TO

OFFICE OF GENERAL COUNSEL

DATE: February 26, 2008

ANALYST: Laura Sinram

I. COMMITTEE: San Antonio Police Officers Association Political
 Action Committee
 C00396655
 Robert Grajeda, Treasurer (9/20/06 – present)

1939 NE Loop 410, Suite 300
 San Antonio, TX 78217

II. RELEVANT STATUTE: 2 U.S.C. §432
 2 U.S.C. §434(b)
 2 U.S.C. §439a(b)
 11 CFR §102.9
 11 CFR §102.15

III. BACKGROUND:

Other Violations of the Federal Election Campaign Act (Unauthorized Disbursement of Committee Funds)

of the San Antonio Police Officers Association Political Action Committee (“the Committee”), made unauthorized disbursements of Committee funds totaling approximately \$62,400.00 during the 2005-2006 election cycle.

On September 14, 2006, the Reports Analysis Division (“RAD”) Compliance Branch Chief spoke with Carmen Ruffin, a Committee representative, who explained that

the new treasurer was Robert Grajeda, and the Committee was being reorganized. RAD Compliance Branch Chief advised Ms. Ruffin to have Mr. Grajeda call her and file an amended Statement of Organization (FEC FORM 1) to disclose himself as the new treasurer (Attachment 2).

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On January 4, 2007, Mr. Grajeda called the Analyst and stated that he wanted to terminate the Committee.

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On February 21, 2008, the Party/Non-Party Branch Chief (BC) left a telephone message for Mr. Grajeda asking him about the status of amending the reports to disclose unauthorized non-federal activity from the 2005-2006 election cycle, which had not been included in the original filings. The BC left another message for Mr. Grajeda on February

25, 2008. Later that day, Mr. Grajeda returned the BC's phone call and stated that the Committee did not have any records for the omitted 2005-2006 cycle activity "in-house," and that he would need to check the Committee's State reports to see if they include this activity and then transfer the information to the FEC reports. Mr. Grajeda added that if the activity was not reported on State reports, he would need to "start from scratch" and get the information from the transaction statements and records, which would take more time. Mr. Grajeda stated that he could not provide a time line for submitting the amendments; that his boss indicated this should be the top priority; and that he would follow up with the BC regarding the status of the amendments the following week. The BC emphasized that the amendments should be filed as soon as possible.

To date, no further communication has been received from the Committee regarding this matter.

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