



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1229

Date Filmed 1/28/83 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

Circulation materials exempt pursuant to

5 USC § 552(b)(3); tally sheet

Comments exempt pursuant to 5 USC § 552(b)(5)

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- | | |
|--|---|
| ☐ (1) Classified Information | ☐ (6) Personal privacy |
| ☐ (2) Internal rules and practices | ☐ (7) Investigatory files |
| ☒ (3) Exempted by other statute | ☐ (8) Banking Information |
| ☐ (4) Trade secrets and commercial or financial information | ☐ (9) Well Information (geographic or geophysical) |
| ☒ (5) Internal Documents | |

Signed

Maura Ghera

Date

January 7, 1983

8304037333

Perm File



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 27, 1982

Paul Friedman, Treasurer
Florida for Kennedy Committee
Britton, Cohen, Kaufman, Benson and
Schantz
Southeast First National Bank Building
Miami, Florida 33131

Re: MUR 1229

Dear Mr. Friedman:

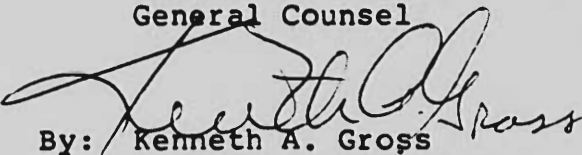
On December 23, 1982, the Commission determined to take no further action against your committee, the Florida for Kennedy Committee, in the above-captioned matter. Accordingly, the file in this matter is now closed and it will become part of the public record within 30 days. If you wish to submit any materials to appear on the public record, please do so within ten days.

As you know, the Commission determined that there was probable cause to believe that your committee violated 2 U.S.C. § 434(b)(9) and conciliation negotiations ensued. As 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission, please advise us in writing if you wish any such information to become public.

If you have any questions please contact Maura White at 202-523-4057.

Sincerely,

Charles N. Steele
General Counsel

By: 
Kenneth A. Gross
Associate General Counsel

830406733



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Paul Friedman, Treasurer
Florida for Kennedy Committee
Britton, Cohen, Kaufman, Benson and
Schantz
Southeast First National Bank Building
Miami, Florida 33131

Re: MUR 1229

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If you have any questions please contact Maura White at 202-523-4057.

Sincerely,

Charles N. Steele
General Counsel

MW 12/23/82

By: Kenneth A. Gross
Associate General Counsel

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Florida for Kennedy Committee) MUR 1229

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 23, 1982, the Commission decided by a vote of 6-0 to take the following actions in MUR 1229:

1. Take no further action against the Florida for Kennedy Committee.
2. Send the letter as submitted with the General Counsel's Report signed December 6, 1982.
3. Close the file.

Commissioners Aikens, Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively in this matter.

Attest:

12/23/82
Date

Jody C. Ransom
for Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary:
Circulated on 48 hour tally basis:
Objection withdrawn:

12-8-82, 10:12
12-8-82, 4:00
12-23-82, 9:47

8304037336



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: DECEMBER 23, 1982

SUBJECT: WITHDRAWAL OF OBJECTION TO MUR 1229,
General Counsel's Report signed
December 6, 1982; Received in OCS,
12-8-82, 10:12

You were previously notified of an objection to the
above-captioned matter by Commissioner Aikens.

By memorandum dated December 22, 1982, Commissioner Aikens
withdrew her objection to this matter and cast an affirmative
vote.

A copy of the certification in MUR 1229 is attached.

Attachment

83040673737



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
GENERAL COUNSEL *mwc*

FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*

DATE: DECEMBER 13, 1982

SUBJECT: OBJECTION - MUR 1229 General Counsel's
Report signed December 6, 1982;
Received in OCS, 12-8-82, 10:12

The above-named document was circulated to the
Commission on December 8, 1982 at 4:00.

Commissioner Aikens submitted an objection at 4:20,
December 10, 1982.

This matter will be placed on the agenda for the
executive session of Tuesday, January 4, 1983. A copy
of Commissioner Aikens' vote sheet with comments is attached.

Attachment

8304037336

December 8, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1229

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

Attachment

cc: White

330406739

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)
Florida for Kennedy Committee) MUR 1229

82 DEC 8 AIO: 12

GENERAL COUNSEL'S REPORT

I. Background

On January 13, 1981, the Commission determined that there was probable cause to believe that the Florida for Kennedy Committee ("Committee") violated former 2 U.S.C. § 434(b) (9) (recodified at 2 U.S.C. § 434(b) (5) (A)) by failing to report certain required expenditure information on its October 10, 1979, Quarterly Report.

On October 12, 1982, the United States Court of Appeals for the Eleventh Circuit denied the Commission's petition for rehearing and suggestion for rehearing en banc. Federal Election Commission v. Florida for Kennedy Committee, 681 F.2d 1281

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(11th Cir. 1982), reh. denied, No. 80-6013 (Oct. 12, 1982). Thus, the opinion of the three judge panel, that the Commission does not have jurisdiction over any draft committees' activities which predate the Federal Election Campaign Act Amendments of 1979, Pub.L. 96-187, 93 Stat. 1399, stands as the law of that circuit.

II. Legal Analysis

In view of the opinion of the three judge panel discussed above, it is the recommendation of the General Counsel that the Commission take no further action against the Florida for Kennedy Committee in the instant matter.

III. General Counsel's Recommendations

1. Take no further action against the Florida for Kennedy Committee.
2. Send the attached letter.
3. Close the file.

December 6, 1982
Date

Charles N. Steele
General Counsel

By:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachment
Letter

8304037371

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida for Kennedy Committee)

MUR 1229

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on January 13, 1981, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1229:

1. Find probable cause to believe the Florida for Kennedy Committee violated former 2 U.S.C. §434(b)(9) (recodified at §434(b)(5)(A)).
2. Approve the conciliation agreement and letter attached to the General Counsel's December 18, 1980 report in this matter.

Attest:

1-14-81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

8304067372

BEFORE THE FEDERAL ELECTION COMMISSION
December 18, 1980

In the Matter of)
) MUR 1229
Florida for Kennedy Committee)

GENERAL COUNSEL'S REPORT

I. Background

On July 22, 1980, the Commission found reason to believe the Florida for Kennedy Committee ("committee") violated former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)). On August 7, 1980, and September 24, 1980, the responses of the committee to the reason to believe finding were received by the Office of General Counsel. On October 27, 1980, the Office of General Counsel mailed the committee a brief which informed the respondent that it is the General Counsel's recommendation that the Commission find probable cause to believe the committee violated former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)). A return receipt indicates that the committee received the General Counsel's brief on October 29, 1980. To date, the committee has not filed a response brief with the Office of General Counsel.

II. Legal Analysis

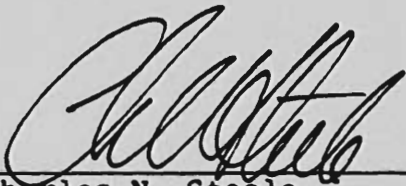
Because we have received no response from the committee, the legal analysis, as presented in the General Counsel's brief, remains the same (Attachment 1). We recommend a finding of probable cause to believe against the committee

and the sending of a proposed conciliation agreement to the committee.

RECOMMENDATIONS

1. Find probable cause to believe the Florida for Kennedy Committee violated former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)).
2. Approve the attached conciliation agreement and letter.

30 December 1980
Date


Charles N. Steele
General Counsel

Attachments:

1. Brief
2. Proposed letter and conciliation agreement

MW;rd
SET
KAG

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ATTACHMENT 1

In the Matter of)
) MUR 1229
Florida for Kennedy Committee)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

On March 21, 1980, the Reports Analysis Division referred the Florida for Kennedy Committee ("Committee") to the Office of General Counsel for failure to provide complete information concerning certain expenditures which were made by the Committee. On July 22, 1980, the Commission found reason to believe the Committee violated former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)) by its failure to report the identification of some persons or individuals to whom expenditures were made, and the dates and purposes of certain expenditures which were reported on the October 10, 1979, quarterly report. A reason to believe notification letter was mailed to the Committee on July 25, 1980. On August 7, 1980, and September 24, 1980, the responses of the Committee were received by the Office of General Counsel.

The August 7, 1980, response of the Committee stated that it was the treasurer's intention "to comply with all statutory requirements regarding reporting of expenditures" and that this matter would receive the treasurer's "immediate attention." The September 24, 1980, response of the Committee stated that the Committee had, in fact, supplied the Commission with much

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of the expenditure information which had been previously omitted from the October 10, 1979, quarterly report. The Committee's response also noted that although the "supporting documentation for the precise breakdown" of expenditures had been stolen, the treasurer was "doing [his] best to provide the Commission with precise details where possible" and that the treasurer's further efforts would be reported to the Commission "within the next three weeks." During a telephone conversation with a staff member of the Office of General Counsel on September 24, 1980, the Committee treasurer stated that, due to his confusion, he had been incorrect in stating, in his response of September 24, 1980, that the information requested by the Commission had been previously supplied by the Committee.

II. Legal Analysis

Pursuant to former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)) and former 11 C.F.R. § 104.2(b)(9) (recodified at § 104.3(b)(3)) each report filed by a political committee is required to contain the identification of each person to whom expenditures have been made within the calendar year in an aggregate amount or value in excess of \$100 and the amount, date, and purpose of each such expenditure. 1/ Former 11 C.F.R. § 104.2(b)(9) elaborated that all expenditures in excess of \$100 during a calendar year shall be reported, together with

1/ The term "identification" is defined at former 2 U.S.C. § 431(j) (recodified at § 431(13)) to mean, in the case of an individual, his full name and the full address of his principal place of residence; in the case of a person, it is defined to mean the full name and address of such person.

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the amount, date, and "particulars" of each expenditure. Thus, committees are required to include a description of the goods or services purchased in sufficient detail to make the expenditures' purpose clear and must set forth the actual use to which the funds were put so that the ultimate payee is disclosed. See Commission Memorandum #844, Sept. 7, 1976; Notice to All Candidates and Committees, Sept. 29, 1976; FEC Record, Oct. 12, 1976 at 2. 2/

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The October 10, 1979, quarterly report, and information submitted subsequently by the Committee, did not report the dates that certain expenditures were made, the identification of some persons or individuals to whom expenditures were made, or the purpose of certain expenditures. In some instances the reports did not list the ultimate payee of the Committee's funds; instead expenditures were listed as payments to individuals for "reimbursed expenses" or for broad categories such as "consultant, advertising, and office expense." In addition, the October 10 filing occasionally reported expenditures to one person or individual for multiple purposes rather than separately reporting each expenditure in excess of \$100. In several instances the filing

2/ Present 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(3) require that each report filed shall contain the full name and address of each person to whom an expenditure in an aggregate amount or value in excess of \$200 within the calendar year is made by the reporting committee, together with the date, amount, and purpose of such expenditure. 11 C.F.R. § 104.3(b)(3)(i)(A) defines "purpose" to mean a brief statement or description of why the disbursement was made.

did not adequately describe in sufficient detail the goods or services purchased.

Although the Committee treasurer has stated that, where possible, he will provide the "precise details" concerning expenditure information within "the next three weeks," almost one year has elapsed since the initial filing of the report in question. At the time of the filing of the October 10, 1979, report, the Committee itself noted that they had "overlooked listing the dates involved with respect to [the] itemized expenditures." Moreover, while the Committee's October 10, 1979, report noted that the Committee was "presently preparing the appropriate information and will forward [it] as soon as possible," the Committee's responses of January 8, 1980, and February 13, 1980, to requests for additional information did not provide the information which is required to be reported.

Thus, in the General Counsel's view, the Florida for Kennedy Committee violated former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)) when it failed to report the identification of certain persons or individuals to whom expenditures were made and the date and purpose of certain expenditures on the October 10, quarterly report.

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III. GENERAL COUNSEL'S RECOMMENDATION

The General Counsel recommends that the Commission find probable cause to believe the Florida for Kennedy Committee violated former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)).

24 October 1980
Date



Charles N. Steele
General Counsel

83040373870



FEDERAL ELECTION COMMISSION

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

MEMORANDUM TO : THE COMMISSION

FROM: MARJORIE W. EMMONS/MARGARET CHANEY

DATE: OCTOBER 28, 1980

SUBJECT: MUR 1229 - General Counsel's Brief
Memorandum to the Commission dated 10-27-89

The attached documents are circulated for your information.

ATTACHMENTS:

1) Memo; 2) Brief; 3) Letter

October 27, 1980

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1229

Please have the attached Memo and Brief distributed to the Commission on an informational basis. Thankyou.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Friedman
Britton, Cohen, Kaufman,
Benson and Schantz
8th Floor
Southeast First National
Bank Building
Miami, Florida 33131

Re: MUR 1229

Dear Mr. Friedman:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, the Federal Election Commission, on July 22, 1980, found reason to believe that your committee violated former section 434(b)(9) (recodified at § 434(b)(5)(A)) of the Federal Election Campaign Act of 1971, as amended ("the Act"), and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of the General Counsel is prepared to recommend that the Commission find probable cause to believe that a violation has occurred.

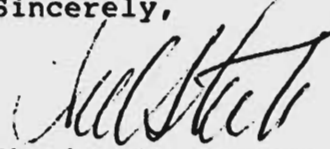
Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (10 copies) stating your position on the issues and replying to the brief of the General Counsel. (Three copies of such brief should also be forwarded to the Office of General Counsel.) The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of probable cause to believe a violation has occurred.

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety, days to settle this matter through a conciliation agreement. This does not preclude settlement of this matter through informal conciliation prior to a finding of probable cause to believe, if you so desire.

Letter to: Paul Friedman
Page 2

Should you have any questions, please contact Maura White
at 202/523-4060.

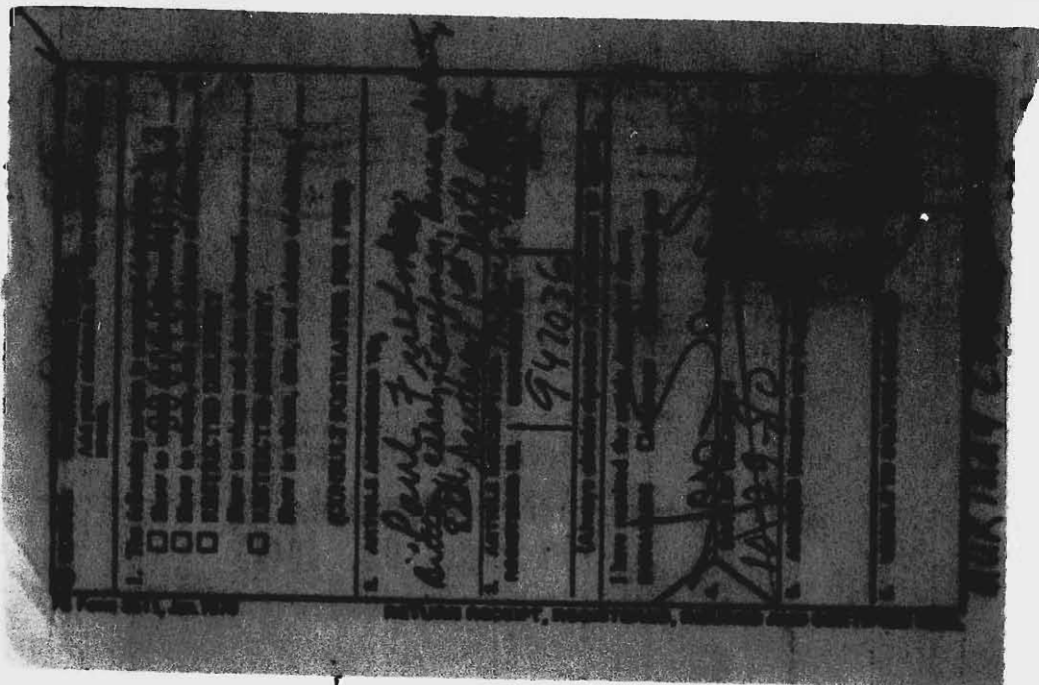
Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
SECRETARY

80 OCT 27 P 1: 42

October 27, 1980

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: MUR 1229

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of this brief and a letter notifying the Respondent of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe was mailed on October 27, 1980. Following receipt of the Respondent's reply to this notice, this Office will make a further report to the Commission.

Attachments

1. Brief
2. Letter to Respondent

8304037380



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 27, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Friedman
Britton, Cohen, Kaufman,
Benson and Schantz
8th Floor
Southeast First National
Bank Building
Miami, Florida 33131

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8304037380

Letter to: Paul Friedman
Page 2

Should you have any questions, please contact Maura White
at 202/523-4060.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

83040373837

In the Matter of)
) MUR 1229
Florida for Kennedy Committee)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

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II. Legal Analysis

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the amount, date, and "particulars" of each expenditure. Thus, committees are required to include a description of the goods or services purchased in sufficient detail to make the expenditures' purpose clear and must set forth the actual use to which the funds were put so that the ultimate payee is disclosed. See Commission Memorandum #844, Sept. 7, 1976; Notice to All Candidates and Committees, Sept. 29, 1976; FEC Record, Oct. 12, 1976 at 2. 2/

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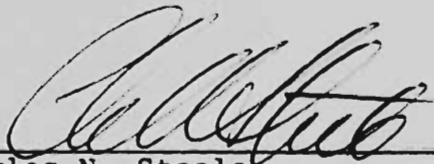
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Thus, in the General Counsel's view, the Florida for Kennedy Committee violated former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)) when it failed to report the identification of certain persons or individuals to whom expenditures were made and the date and purpose of certain expenditures on the October 10, quarterly report.

III. GENERAL COUNSEL'S RECOMMENDATION

The General Counsel recommends that the Commission find probable cause to believe the Florida for Kennedy Committee violated former 2 U.S.C. § 434(b)(9) (recodified at § 434(b)(5)(A)).

24 October 1980
Date



Charles N. Steele
General Counsel

83040373812

LAW OFFICES
BRITTON, COHEN, KAUFMAN, BENSON & SCHANTZ

910354
GCC #2815

JOHN L. BRITTON
JAMES COHEN
WILLIAM H. BENSON
CARMEN A. ACCORDINO
EDWARD A. KAUFMAN
LAWRENCE M. SCHANTZ
MARC LIPSTZ
JAMES T. HALEY
W. JOHN GUNDLACH, JR.
FRANK J. SINAORA
JOSEPH I. DAVIS, JR.
JERRY M. MARKOWITZ

LEO ADDERLY
ANTHONY N. BRIMO
FRANCIS L. CARTER
JERROLD C. COFF
PAUL D. FRIEDMAN
HAROLD A. GREENE
MICHAEL JOYCE
JOHN T. KINSEY
ROBERT A. KRAMER
J. ROBERT OLIAN
JAMES P. PAUL
ALFONSO J. PEREZ
RAYMOND B. RAY
THOMAS RINGEL
STUART R. SILVER
VALERIE A. STOTT

REPLY TO:

Miami

80 SEP 29 11:41
EIGHTH FLOOR
SOUTHEAST FIRST NATIONAL BANK BLDG.
MIAMI, FLORIDA 33131
(305) 371-5192

SUITE 100, 500 SOUTHEAST SIXTH STREET
FT. LAUDERDALE, FLORIDA 33301
(305) 463-8897
DIRECT DADE LINE - 523-6611

September 24, 1980

830403738
Maura White, Esquire
Office of The General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C., 20463

Re: MUR 1229

Dear Ms. White:

Pursuant to our telephone conversation of this date, enclosed please find photocopy of my Federal Express delivery letter to you of September 23, 1980.

Yours sincerely,

Paul Friedman/dsd
PAUL D. FRIEDMAN

PDF:dsd

0 SEP 29 11:41

LAW OFFICES
BRITTON, COHEN, KAUFMAN, BENSON & SCHANTZ

JOHN L. BRITTON
JAMES COHEN
WILLIAM H. BENSON
GARNER A. ADDENDINO
EDWARD A. KAUFMAN
LAWRENCE M. SCHANTZ
BARRY LIPKIN
JAMES T. KALEY
W. JOHN GUNBLACK, JR.
FRANK J. SHAGRA
JOSEPH I. DAVIS, JR.
JERRY M. MARSHWITZ

LEO ASHERLY
ANTHONY M. BRIMO
FRANCIS L. CARTER
JERROLD C. COFFY
PAUL D. FISHMAN
HAROLD A. GREENE
MICHAEL JOYCE
JOHN T. KIRSEY
ROBERT A. KRAMER
J. ROBERT OLAN
JAMES P. PAUL
ALFONSO J. PEREZ
RAYMOND B. RAY
THOMAS SWEDE
STUART S. SILVER
VALERIE A. STOTT

REPLY TO:

Miami

EIGHTH FLOOR
SOUTHEAST FIRST NATIONAL BANK BLDG.
MIAMI, FLORIDA 33131
(305) 371-5192

SUITE 100, 500 SOUTHEAST SIXTH STREET
FT. LAUDERDALE, FLORIDA 33301
(305) 463-6637
DIRECT DIAL LINE - 523-6611

September 23, 1980

Maura White, Esquire
Office of The General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FEDERAL EXPRESS DELIVERY

Re: MUR 1229

Dear Ms. White:

In response to your inquiries regarding the matters referenced above, and more particularly, the letter of Mr. Thomas J. Haselhorst of January 8, 1980, please consider the following material as responsive. It appears that many of the items requested in said letter were previously amended or otherwise supplied to the Commission by written letter or amendment by the immediate past Treasurer of this Committee, Gary S. Burman. Please see Mr. Burman's letters of January 25, 1980, and April 20, 1980, in connection therewith.

Additionally, I have endeavored to ascertain exactly what information the Committee has failed to provide the Commission. It appears that the Commission is looking for details regarding the individuals or organizations noted on pages two and three of Mr. Haselhorst's January 8, 1980, letter. As you know, the expenditures were made approximately one year ago, and it is taking me a great deal of time to search back through our remaining records to ascertain the information requested. Your attention is specifically called to the fact that on October 17, 1979, I wrote a letter to William C. Oldaker, then General Counsel to the Commission, regarding numerous lost records of the Committee by reason of a burglary of my automobile. It appears that much of the supporting documentation for the precise breakdown for said expenditures was contained in my stolen briefcase at that time.

In any event, I am earnestly doing my best to provide the Commission with precise details where possible. My further efforts, and the results thereof, will be reported to you within the next three weeks.

If there is any additional information to which I have not addressed myself, and which the Commission requires, please specifically advise me of same.

**Maura White, Esquire
Office of The General Counsel
Federal Election Commission**

Page Two

September 23, 1980

In filing this reply to your inquiries, the Florida for Kennedy Committee does not waive its contention that the actions of our Committee do not fall under the scope of the Federal Election Campaign Act.

Sincerely yours,

**PAUL D. FRIEDMAN, Treasurer
Florida for Kennedy Committee**

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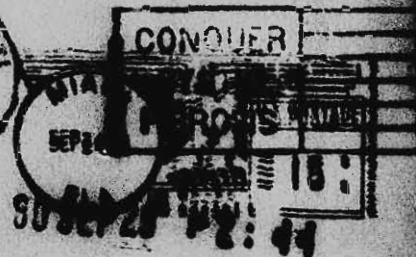
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83040373816

LAW OFFICES

BRITTON, COHEN, KAUFMAN, BENSON & SCHANTZ

6TH FLOOR, SOUTHEAST FIRST NATIONAL BANK BLDG.
MIAMI, FLORIDA 33131



Maura White, Esquire
Office of The General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

910259

LAW OFFICES

BRITTON, COHEN, KAUFMAN, BENSON & SCHANTZ

RECEIVED

CCC#2749

JOHN L. BRITTON
JAMES COHEN
WILLIAM H. BENSON
CARMEN A. ACCORDINO
EDWARD A. KAUFMAN
LAWRENCE M. SCHANTZ
MARC LIPSITZ
JAMES T. HALEY
W. JOHN GUNDLACH, JR.
FRANK J. SINAGRA
JOSEPH I. DAVIS, JR.
JERRY M. MARKOWITZ

LEO ADDERLY
ANTHONY N. BRIMO
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J. ROBERT OLIAN
JAMES P. PAUL
ALFONSO J. PEREZ
RAYMOND S. RAY
THOMAS RINGEL
STUART R. SILVER
VALERIE A. STOTT

REPLY TO:

Miami

80 SEP 24 P 2:30
EIGHTH FLOOR
SOUTHEAST FIRST NATIONAL BANK BLDG.
MIAMI, FLORIDA 33131
(305) 371-5192

SUITE 100, 500 SOUTHEAST SIXTH STREET
FT. LAUDERDALE, FLORIDA 33301
(305) 463-8837
DIRECT DIAL LINE - 523-6611

September 23, 1980

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Maura White, Esquire
Office of The General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1229

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Additionally, I have endeavored to ascertain exactly what information the Committee has failed to provide the Commission. It appears that the Commission is looking for details regarding the individuals or organizations noted on pages two and three of Mr. Haselhorst's January 8, 1980, letter. As you know, the expenditures were made approximately one year ago, and it is taking me a great deal of time to search back through our remaining records to ascertain the information requested. Your attention is specifically called to the fact that on October 17, 1979, I wrote a letter to William C. Oldaker, then General Counsel to the Commission, regarding numerous lost records of the Committee by reason of a burglary of my automobile. It appears that much of the supporting documentation for the precise breakdown for said expenditures was contained in my stolen briefcase at that time.

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If there is any additional information to which I have not addressed myself, and which the Commission requires, please specifically advise me of same.

80 SEP 24 P 4:19

8304037312

RECEIVED

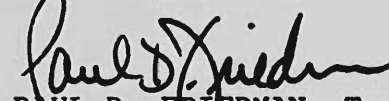
Maura White, Esquire
Office of The General Counsel
Federal Election Commission

Page Two

80 SEP 24 P 2: 01
September 23, 1980

In filing this reply to your inquiries, the Florida for Kennedy Committee does not waive its contention that the actions of our Committee do not fall under the scope of the Federal Election Campaign Act.

Sincerely yours,



PAUL D. FRIEDMAN, Treasurer
Florida for Kennedy Committee

83040373319

PDF:dsd

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9

LAW OFFICES

BRITTON, COHEN, KAUFMAN, BENSON & SCHANTZ

6TH FLOOR, SOUTHEAST FIRST NATIONAL BANK BLDG.

MIAMI, FLORIDA 33131

**Maura White, Esquire
Office of The General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463**

PLEASE COMPLETE ALL INFORMATION IN THE 5 BLOCKS OUTLINED IN GRAY
SEE REVERSE SIDE FOR COMPLETE PREPARATION INSTRUCTIONS

331-277-9
man / 8th Floor
DEPARTMENT / FLOOR NO
101-11-101
101-11-101
101-11-101
STATE ZIP
FL 33131
74

DATE <u>September 21</u>		AIRBILL NO 02175241	
TO (Consignee's Name) <u>Maura White Esq.</u>		If Hold For Pick Up, Please Mark	
COMPANY <u>Federal Election Commission</u>		DEPARTMENT/FLOOR NO <u>101</u>	
STREET ADDRESS <u>1333 K Street, N.W.</u>		G	
CITY <u>Washington, D.C.</u>	STATE <u>1111</u>	ZIP <u>20543</u>	
PURCHASE ORDER NO. OR CONSIGNEE REFERENCE NO		FEE USE FREIGHT CLASS	

Date Recd No _____
 Date Sent No _____
SPECIAL HANDLING
 (Special Services Required)

Restricted Articles		SSS	Govt.	Other
☐	☐	☐	☐	☐ _____
☒	N/A	☐	☐	☐ _____
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☐	N/A	☐	☐	☐ _____
N/A	☐	N/A	☐	☐ _____

 NO. _____ DATE/TIME 07/12/1801

Pieces	Weight	O/S
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Total	Total	

NON-NEGOTIABLE AIRBILL SUBJECT TO CONDITIONS OF CONTRACT SET FORTH ON REVERSE OF SHIPPERS COPY UNLESS YOU DECLARE A HIGHER VALUE. THE LIABILITY OF F.E.C. IS LIMITED TO \$100.00		
EMP NO	AGT/PRO	
DATE		
☐ CASH RECEIVED	AGT/PRO	
☐ RETURN SHIPMENT ☐ THIRD PARTY	☐ ADDRESS CORRECTION	
STREET ADDRESS		
CITY	STATE	ZIP
RECEIVED BY: (Signature) X		

DECLARED VALUE CHARGE	
ADVANCE OFFICE	
ADVANCE DESTINATION	
OTHER	
TOTAL CHARGES	
DATE/TIME	

BILLING COPY



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

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

DATE: SEPTEMBER 10, 1980

SUBJECT: MUR 1229 - Interim Investigative Report #1,
dated 9-3-80; Signed 9-9-89; Received in OCS
9-9-80, 12:48

The above-named document was circulated to the
Commission on a no-objection basis at 4:00, September 9, 1980.

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

83040675821

September 9, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1229

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

83040673822

BEFORE THE FEDERAL ELECTION COMMISSION
September 3, 1980

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

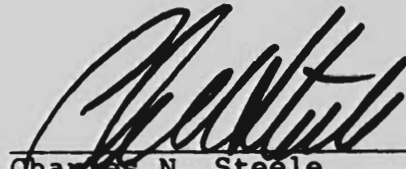
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In the Matter of)
) MUR 1229
Florida for Kennedy)
Committee)

INTERIM INVESTIGATIVE REPORT #1

8 3 0 4 0 3 7 3 8 2 3
On July 22, 1980, the Commission determined that there is reason to believe that the Florida for Kennedy Committee violated 2 U.S.C. § 434(b)(5)(A). A reason to believe notification letter was mailed to the committee on July 25, 1980. On August 7, 1980, the Office of General Counsel received a letter from Paul Friedman, the committee treasurer, which stated that it is necessary for him to review the matter with the former treasurer of the committee but that it is his intention to comply with the reporting requirements as soon as possible. On August 12, 1980, the Office of General Counsel mailed Mr. Friedman, at his request, a copy of a request for additional information which had been sent previously to the committee. Upon receipt of the committee's reply the Office of General Counsel will make a recommendation to the Commission.

9 Sept. 1980
Date


Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 12, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Paul Friedman
Britton, Cohen, Kaufman, Benson
and Schantz
Eighth Floor
Southeast First National Bank Bldg.
Miami, Florida 33131

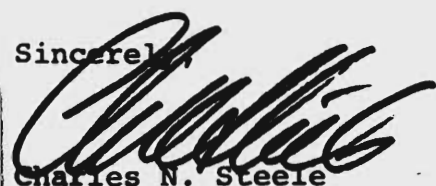
Re: MUR 1229

Dear Mr. Friedman:

Enclosed please find, as requested in your letter dated August 4, 1980, a copy of the request for additional information ("RFAI") sent to the Florida for Kennedy Committee by the Reports Analysis Division of the Commission on January 8, 1980.

If you have any questions please contact Maura White, the staff member assigned to this matter, at 202-523-4060.

Sincerely,


Charles N. Steele
General Counsel

PS Form 3811, Aug. 1977

1. Following service is requested (check one).
a. Show to whom and date delivered. _____
b. 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: *Paul Friedman*
Britton, Cohen, Kaufman
8th Floor
Southeast First National Bank Bldg.
Miami, Florida 33131

3. ARTICLE REGISTERED NO. *94598* CERTIFIED NO. *94598* INSURED NO. _____

4. I have received the article described above.
SIGNATURE *[Signature]* DATE OF DELIVERY _____ AUTHORIZED AGENT _____

5. ADDRESSEE'S SIGNATURE _____

6. UNDELIVERED DELIVERY MESSAGE _____

White *MUR 1229*



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

8 January 1980

Mr. Gary Burman, Treasurer
Florida for Kennedy Committee (C99001091)
255 Alhambra Circle
Coral Gables, Florida 33134

Dear Mr. Burman:

This letter is prompted by the Commission's review of your July 10 and October 10, 1979 Reports of Receipts and Expenditures. The review indicated the receipt of an apparent prohibited contribution and that certain information required by the Federal Election Campaign Act and Regulations was omitted or in error. An itemization of this information follows.

On Schedule A for Line 14a, your October 10 Report discloses an apparent contribution from a labor organization, "District Council of New York City United Brotherhood of Carpenters & Joiners of America." You are advised that contributions from labor organizations are prohibited by 2 U.S.C. 441b, unless made from a separate segregated fund for voluntary contributions established by the labor organization. A copy of that portion of your report is attached so that a review of your records may be made.

The Commission recommends that if you have received a prohibited contribution, you refund the full amount to the donor. You should notify the Commission by letter immediately of your determination in this matter. The return of the contribution should be reported as a contribution refund on Schedule B for Line 21a on your next report of receipts and expenditures.

If you find that the source of the contribution is permissible under the Act, please submit a statement for the public record which would clarify the source and the exact nature of the account upon which the check was drawn. If the source of the contribution has been disclosed incompletely or incorrectly, please amend your original report.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, your prompt refund of the full amount to the donor will be taken into consideration.

11 C.F.R. 100.11 defines "occupation" to be the "principal job title and whether or not self-employed." 11 C.F.R. 100.12 defines "principal place of business" to be the "full name under which the business is conducted and the city and state in which the person is employed or conducts business." (Emphasis added). 2 U.S.C. 434(b)(2) requires disclosure of this information for each contributor who has contributed in excess of \$100 to the committee. Please amend your October 10 Report to provide the identification, (full name and full address), occupation and principal place of business for each such contributor.

Page Two.
Request for Additional Information.
July 10 and October 10, 1979 Reports.
Florida for Kennedy Committee (C99001091)

On Schedule B for Line 20a, your committee itemized expenditures to three individuals and listed the expenditures as "in-kind." Please amend your October 10 Report to identify the itemized contributions from these individuals as "in-kind" contributions as required under 11 C.F.R. 104.3.

2 U.S.C. 434(b)(9) requires disclosure of the identification of each person to whom expenditures have been made by or on behalf of the committee which is in excess of \$100, or in an amount less than \$100 if the total exceeds \$100 for the calendar year, together with the amount, date and particulars of each such expenditure. If persons to whom expenditures have been made are acting as agents on behalf of the committee, then the ultimate recipient(s) of those expenditures, along with the particulars of each such expenditure, must be disclosed in accordance with 2 U.S.C. 434(b)(9).

Please amend your July 10 Report to provide the identification, (full name and full mailing address), of recipients of expenditures made by the committee. Please also clarify the particulars of an expenditure made to Sergio Bendixen for "Moving Expense," i.e., is this a reimbursement for personal moving expense or a payment for services rendered on behalf of the committee?

Please amend your October 10 Report to provide the dates for all expenditures itemizable under 2 U.S.C. 434(b)(9).

Certain expenditures on the committee's October 10 Report have what appear to be unclear particulars of expenditures as applied to possible ultimate recipient(s). Please amend your October 10 Report to clarify the particulars of expenditures made to individuals for "Rent," i.e., did the individuals provide space to the committee or did they act as agents on behalf of the committee to secure space and pay any applicable rents?

In addition, while the terms "Consulting," "Travel" and "Advertising" may be acceptable under certain circumstances for descriptions of particulars of individual expenditures, a single expenditure for several purposes may be unclear. Also, particulars noted as "Consulting" and "Advertising" may be unclear as to the ultimate recipient(s) of the expenditures. Please amend your October 10 Report to clarify the particulars of, and if applicable, the ultimate recipient(s), of the following expenditures, (a possible need to clarify ultimate recipient is denoted by an "*"):

Holly Gewandter	\$ 401.75	"Reimbursed Expenses"
Camilla Bruce	\$ 164.64	" "
Katherine Odhay	\$ 365.00	" "
McPabitch Office	\$ 273.04	" "
Sergio Bendixen	\$12,206.44	"Consulting, Travel, Office Expense"
*D. Kennedy	\$ 2,113.92	" " " "
*Jim Flack	\$ 7,741.04	" " " "
*Mike Abrams	\$ 1,375.49	"Travel, Office Exp., Advertising"

(continued)

Page Three.

Request for Additional Information.

July 10 and October 10, 1979 Reports.

Florida for Kennedy Committee (C99001091)

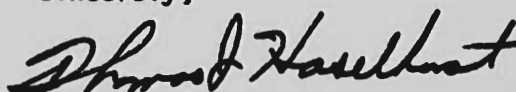
Project Masters	\$ 3,809.86	"Consulting, Advertising*, Office Exp.
Zale Koff	\$ 1,150.00	"Advertising"
Cheryl Wohl	\$ 1,498.12	"Consulting, Office Expense"
Millenium Group	\$ 1,002.21	"Reimbursed Expense, Advertising"
L. Robinson	\$ 1,300.00	"Consulting, Travel"
*Roy Mathis	\$ 2,014.35	" "

Your October 10 Report includes a Schedule C for a loan made to the committee, but the committee has failed to provide information on debts and obligations owed by the committee for Line 13 of the Summary Page. (A loan is an obligation which is reportable and should be included with all obligations on Line 13). Please amend your October 10 Report accordingly.

For your future reporting information, transfers from political committees should be itemized on a separate Schedule A for Line 15a or 15b and included in the totals for Line 15a or 15b of the Detailed Summary Schedule. (An amendment is not required for this statement).

Be advised that you must supply the Commission with the requested information within fifteen (15) days from the date of this letter. If you have any questions, contact Mike Thompson in our Reports Analysis Division on the toll free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

83040373877

LAW OFFICES
BRITTON, COHEN, KAUFMAN, BENSON & SCHANTZ

909515
ACC#
2250

JOHN L. BRITTON
JAMES COHEN
WILLIAM H. BENSON
CARMEN A. ACCORDINO
EDWARD A. KAUFMAN
LAWRENCE M. SCHANTZ
MARC LIPSITZ
JAMES T. HALEY
W. JOHN GUNDLACH, JR.
FRANK J. SINAGRA
JOSEPH I. DAVIS, JR.
JERRY M. MARKOWITZ

LEO ADDERLY
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J. ROBERT OLIAN
JAMES P. PAUL
ALFONSO J. PEREZ
RAYMOND B. RAY
THOMAS RINGEL
STUART R. SILVER
VALERIE A. STOTT

REPLY TO:

Miami

EIGHTH FLOOR
SOUTHEAST FIRST NATIONAL BANK BLDG.
MIAMI, FLORIDA 33131
(305) 571-5192

SUITE 100, 500 SOUTHEAST SIXTH STREET
FT. LAUDERDALE, FLORIDA 33301
(305) 463-6537
DIRECT DIAL LINE - 523-6611

August 4, 1980

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

Re: MUR 1229

Dear Ms. White:

This will acknowledge receipt of a letter dated July 25, 1980 from Chairman Max L. Freidersdorf, Federal Election Commission, to Mr. Gary Burman. You and I discussed this matter by telephone on July 31, 1980, wherein I advised you that the Florida for Kennedy Committee amended its registration statement to indicate that the undersigned is now Treasurer of said committee, and not Mr. Burman. All future contact with regard to this matter should be directed to the undersigned.

I understand that the Commission has determined that there is reason to believe that the Committee has violated 2 U.S.C. §434(b)(5)(A), by reason of the Committee's failure to completely provide information concerning the name and address of each person to whom an expenditure was made, together with date, amount, and purpose therefore.

In order to more fully resolve this matter, it is my intention to review same with the Committee's former Treasurer. It appears that there was a great deal of contact between the Commission and the Committee, through Mr. Burman. I intend to review this matter with Mr. Burman to become more fully advised of the specific items requiring more detailed reporting. It is certainly my intention to comply with all statutory requirements regarding reporting of expenditures. This matter will get my immediate attention, and together it is my hope that this matter can be speedily and satisfactorily resolved.

At this time, please be so kind as to forward me a copy of the Reports Analysis Division's request for additional information of

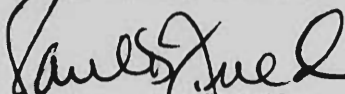
8304037389

August 4, 1980

Page 2

January 8, 1980, to the Committee. Thank you for your cooperation in this matter.

Very truly yours,



PAUL D. FRIEDMAN
For the Film

PDF/cw

83040373829

LAW OFFICES

BRITTON, COHEN, KAUFMAN, BENSON & SCHANTZ

6TH FLOOR, SOUTHEAST FIRST NATIONAL BANK BLDG.
MIAMI, FLORIDA 33131



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

8 3 0 4 0 3 7 3 8 3 0

ROUTING SLIP FOR RTB LETTERS

TO: Chairman/Vice Chairman

FROM: Elissa T. Garr
OGC Enforcement Docket

DATE: 7-24-80

MUR # 1229

1 Date RTB Found 7-22-80

2 Date Cert. Rec'd in OGC 7-24-80

8 Staff Assigned W hite

STAFF CHECK:

MW Accuracy

MW Enclosures

MW Certification

3 Date Rec'd in OGC From Chairman/Vice Chairman

8 7-25-80



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 25, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary Burman, Treasurer
Florida for Kennedy Committee
255 Alhambra Circle
Coral Gables, Florida 33134

Re: MUR 1229

Dear Mr. Burman:

The Federal Election Commission notified you in letters dated January 8, 1980, and February 13, 1980, that your committee may have violated section 434(b)(5)(A) (formerly § 434(b)(9)) of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on July 22, 1980, that there is reason to believe that your committee violated 2 U.S.C. § 434(b)(5)(A). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) (formerly § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Maura White, the staff member assigned to this matter at 202/523-4060.

Sincerely,

Max L. Friedersdorf

Max L. Friedersdorf
Chairman

Enclosure

83040332



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary Burman, Treasurer
Florida for Kennedy Committee
255 Alhambra Circle
Coral Gables, Florida 33134

Re: MUR 1229

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If you have any questions, please contact Maura White, the staff member assigned to this matter at 202/523-4060.

Sincerely,

MW 7/24/80

Enclosure

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE July 25, 1980

MUR NO. 1229
STAFF MEMBER(S) & TEL. NO.
M. White/ D. Branch

RESPONDENT Florida for Kennedy

202/523-4060

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

BACKGROUND

On March 21, 1980, the Reports Analysis Division ("RAD") referred the name of the Florida for Kennedy Committee ("Committee") to the Office of General Counsel for failure to provide complete information regarding the reporting of expenditures in violation of 2 U.S.C. § 434(b)(5)(A) (former 2 U.S.C. § 434(b)(9)). The July 10, 1979, and October 10, 1979, quarterly reports filed by the committee omitted, in some instances, the addresses of persons to whom expenditures were made and the dates of the expenditures, and failed to properly report the particulars of certain expenditures as well as the ultimate recipients of those expenditures.

FACTUAL BASIS AND LEGAL ANALYSIS

On January 8, 1980, RAD mailed a request for additional information ("RFAI") to the Committee in regard to its failure to provide the identification of the recipients of expenditures (full name and full mailing address) on its July 10, 1979, quarterly report, and its failure to report the dates of all expenditures as well as the ultimate recipient and itemized particulars of certain expenditures on its October 10, 1979, quarterly report. The Committee responded to the RFAI by both telephone and letter on January 21, 1980, and January 30, 1980, respectively. The committee's January 30 response stated that both the July 10 and October 10 quarterly reports were in the process of being amended, and that they would be filed upon completion. This response was deemed inadequate by the Commission

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and on February 13, 1980, a second notice was mailed to the committee. On March 12, 1980, RAD telephoned the committee treasurer to inquire as to the status of amendments to the July 10 and October 10 quarterly reports. The treasurer responded that a portion of the work had been completed, but that it would not be possible to obtain much of the information.

On March 19, 1980, the committee filed an amendment to the July 10, 1979, quarterly report. This amendment supplied the addresses of all persons to whom expenditures had been made during this reporting period. As the committee did provide the previously omitted addresses, this filing is a satisfactory response in regard to expenditure information. To date, however, the committee has not amended their October 10 report to reflect previously omitted information. This report is still deficient in the reporting of all dates that expenditures were made, and clarification is needed as to the ultimate recipient of certain expenditures as well as the particulars of certain expenditures.

2 U.S.C. § 434(b)(5)(A) (former § 434(b)(9)) requires that each report filed contain the identification of each person to whom expenditures have been made within the calendar year in an aggregate amount or value in excess of \$200, and the amount, date, and purpose of each such expenditure. ^{1/} 2 U.S.C. § 431(j) (recodified at § 431(13)) defines identification to mean, in the case of an individual, his full name and full address of his principal place of residence; in the case of a person it is defined to mean the full name and address of such person.

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Florida for Kennedy Committee violated 2 U.S.C. § 434(b)(5)(A) (former 2 U.S.C. § 434(b)(9)).

^{1/} Prior to the 1979 amendments to the Act, expenditures in an aggregate amount or value in excess of \$100 within the calendar year were required to be itemized. The change in the amount required to be itemized, however, does not affect the expenditures involved in this matter.

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Florida for Kennedy)

MUR 1229

CERTIFICATION

I, Marjorie W. Emmons, recording secretary for the Federal Election Commission's executive session of July 22, 1980, do hereby certify that the Commission decided by a vote of 5-1 to take the following actions in MUR 1229:

1. Find reason to believe that the Florida for Kennedy Committee violated 2 U.S.C. §434(b)(5)(A) (former 2 U.S.C. §434(b)(9)).
2. Send the letter attached to the General Counsel's June 23, 1980 report in this matter.

Commissioners Aikens, Harris, McGarry, Reiche, and Tiernan voted affirmatively for the decision; Commissioner Friedersdorf dissented.

Attest:

7/23/80

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

830403736



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

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

DATE: JUNE 25, 1980
OBJECTION -

SUBJECT: MUR 1229 - First General Counsel's Report
dated 6-23-80, Received in OCS 6-23-80,

The above-named document was circulated on a 48
hour vote basis at 4:00, June 23, 1980.

Commissioner Friedersdorf submitted an objection
at 8:53, June 25, 1980.

This matter will be placed on the Executive Session
Agenda for Tuesday, July 1, 1980.

Commissioner McGarry submitted an objection at 2:19.

83040373837

June 23, 1980

MEMORANDUM TO: Marjorie W. Emmons
FROM: Jane Colgrove
SUBJECT: MUR 1229

Please have the attached First General Council's
Report on MUR 1229 distributed to the Commission on a
48 hour tally basis.

Thank you.

83040575832

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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL

BY OGC TO THE COMMISSION JUN 23 1980

MUR # 1229

STAFF MEMBER(S)

M. White

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

RESPONDENT'S NAME: Florida for Kennedy

RELEVANT STATUTE: 2 U.S.C. § 434(b)(5)(A)

INTERNAL REPORTS CHECKED: Committee reports

FEDERAL AGENCIES CHECKED: None

SUMMARY OF ALLEGATIONS

On March 21, 1980, the Reports Analysis Division ("RAD") referred the name of the Florida for Kennedy Committee ("Committee") to the Office of General Counsel for failure to provide complete information regarding the reporting of expenditures in violation of 2 U.S.C. § 434(b)(5)(A) (former 2 U.S.C. § 434(b)(9)) (Attachment 1). The July 10, 1979, and October 10, 1979, quarterly reports filed by the committee omitted, in some instances, the addresses of persons to whom expenditures were made and the dates of the expenditures, and failed to properly report the particulars of certain expenditures as well as the ultimate recipients of those expenditures.

FACTUAL BASIS AND LEGAL ANALYSIS

On January 8, 1980, RAD mailed a request for additional information ("RFAI") to the Committee in regard to its failure to provide the identification of the recipients of expenditures (full name and full mailing address) on its July 10, 1979, quarterly report, and its failure to report the dates of all expenditures as well as the ultimate recipient and itemized particulars of certain expenditures on its October 10, 1979, quarterly report. The Committee responded to the RFAI by both telephone and letter on January 21, 1980, and January 30, 1980, respectively. The committee's January 30 response stated that both the July 10 and October 10 quarterly reports were in the process of being amended, and that they would be filed upon completion. This response was deemed inadequate by the Commission

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OFFICE OF THE
COMMISSIONER
80 JUN 23 PM 12: 27

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and on February 13, 1980, a second notice was mailed to the committee. On March 12, 1980, RAD telephoned the committee treasurer to inquire as to the status of amendments to the July 10 and October 10 quarterly reports. The treasurer responded that a portion of the work had been completed, but that it would not be possible to obtain much of the information.

On March 19, 1980, the committee filed an amendment to the July 10, 1979, quarterly report. This amendment supplied the addresses of all persons to whom expenditures had been made during this reporting period. As the committee did provide the previously omitted addresses, this filing is a satisfactory response in regard to expenditure information. To date, however, the committee has not amended their October 10 report to reflect previously omitted information.

2 U.S.C. § 434(b)(5)(A) (former § 434(b)(9)) requires that each report filed contain the identification of each person to whom expenditures have been made within the calendar year in an aggregate amount or value in excess of \$200, and the amount, date, and purpose of each such expenditure. ^{1/} 2 U.S.C. § 431(j) (recodified at § 431(13)) defines identification to mean, in the case of an individual, his full name and full address of his principal place of residence; in the case of a person it is defined to mean the full name and address of such person.

Since the October 10, 1979, quarterly report is still deficient in the reporting of all dates that expenditures were made, and clarification is needed as to the ultimate recipient of certain expenditures as well as the particulars of certain expenditures, the General Counsel recommends that the Commission find reason to believe that the Florida for Kennedy Committee violated 2 U.S.C. § 434(b)(5)(A).

RECOMMENDATIONS

1. Find reason to believe that the Florida for Kennedy Committee violated 2 U.S.C. § 434(b)(5)(A) (former 2 U.S.C. § 434(b)(9)).
2. Send the attached letter.

Attachments:

1. Referral from RAD
2. Letter to Florida for Kennedy

^{1/} Prior to the 1979 amendments to the Act, expenditures in an aggregate amount or value in excess of \$100 within the calendar year were required to be itemized. The change in the amount required to be itemized, however, does not affect the expenditures involved in this matter.

ATTACHMENT # 1

83040373841

REFER TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING

REPORTS ANALYSIS REFERRAL SHEET

DATE MARCH 21, 1980 ANALYST Mike Thompson
TO: _____ TEAM CHIEF Irene Allen
THROUGH: STAFF DIRECTOR JP COMPLIANCE REVIEW CB/ AS
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JP

CANDIDATE/COMMITTEE: Florida for Kennedy
TREASURER: Mr. Gary Burman
ADDRESS: c/o Jeff Safcheck 255 Alhambra Circle, Suite 412
Coral Gables, Florida 33134

AFFILIATE(S):

ALLEGATION(S): CITE: ATTACHMENT(S)
Failure to disclose identification of persons to whom expenditures
have been made; failure to disclose dates of expenditures. 2 U.S.C. 434(b)(9)

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

☒ Normal Review

☐ Other:

ATTACHMENT

☐ Special Project:

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.

PERIOD COVERED FROM May 22, 1979 TO September 30, 1979

TOTAL RECEIPTS \$ 117,076 TOTAL EXPENDITURES \$ 93,715

CASH ON HAND \$ 23,360 (as of 9/30/79) DEBTS \$ 2,000 (From Schedule C)

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

RFAI dated 8 January 1980 for July 10 and October 10 Reports
July 10 and October 10 Amendment received 30 January (Inadequate)
Second Notice Letter for July 10 and October 10 Reports

2
4
6

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

Telecon with Mr. Gary Burman, Treasurer, January 21, 1980
Telecon with Mr. Burman, February 12, 1980
Telecon with Mr. Burman, March 12, 1980

3
5
7

REASON(S) FOR REFERRAL:

ATTACHMENT

Failure to respond adequately to RFAI

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

RFAI & SV for Year-End Report - Corporate contributions

8

ADDENDUM TO FLORIDA FOR KENNEDY:

The committee's October 10 Report contained a cover letter stating that the treasurer was aware of the deficiency in disclosure of expenditures. The dates for expenditures had been omitted. This letter was dated October 9, 1979.

The Request for Additional Information was mailed January 8, 1980. The RFAI also requested identification of persons to whom expenditures had been made along with a breakdown of expenditures to persons for several purposes. To date, no response has been received on these matters. (The amendment dealt with other matters in the RFAI).

The July 10 Report contained an omission rate of 53% for Principal Place of Business, (out of 15 contributors). The October 10 Report, however, had 126 itemizable contributors out of which 29% of the occupations were missing and 78% of the principal places of business were missing or inadequate. Most of the schedules contained a notation that the information was requested. The RFAI requested the information for the October 10 Report.

The committee's response was that each contributor has been mailed a request for the information and a copy of that letter. This was considered to be adequate at the time as the committee appeared to be making some effort to obtain the information.

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FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)
 8 3 0 4 0 3 7 3 8 1 4
 INDEPENDENT EXPENDITORS

DATE 7MAR80
 PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FLORIDA FOR KENNEDY COMMITTEE						ID 8C99001091
	1979 STATEMENT OF ORGANIZATION			22MAY79	5	79FEC/128/0319
	MISCELLANEOUS REPORT			4JUN79 FROM FEC	2	79FEC/128/2867
	MISCELLANEOUS REPORT			13JUN79 TO FEC	2	79FEC/101/3121
	STATEMENT OF ORGANIZATION - AMENDMENT			2JUL79	4	79FEC/101/3451
	STATEMENT OF ORGANIZATION - AMENDMENT			9JUL79	8	79FEC/101/5122
	STATEMENT OF ORGANIZATION - AMENDMENT			22OCT79	4	79FEC/103/0473
	STATEMENT OF ORGANIZATION - AMENDMENT			28DEC79	4	79FEC/103/2203
	JULY 10 QUARTERLY	12,535	6,012	22MAY79 -30JUN79	8	79FEC/101/5130
	REQUEST FOR ADDITIONAL INFORMATION			22MAY79 -30JUN79	3	80FEC/103/2415
	JULY 10 QUARTERLY - AMENDMENT			22MAY79 -30JUN79	4	80FEC/103/4215
	REQUEST FOR ADDITIONAL INFORMATION 2ND			22MAY79 -30JUN79	2	80FEC/105/0643
	OCTOBER 10 QUARTERLY	104,541	87,703	1JUL79 -30SEP79	33	79FEC/102/4060
	REQUEST FOR ADDITIONAL INFORMATION			1JUL79 -30SEP79	1	80FEC/103/2551
	OCTOBER 10 QUARTERLY - AMENDMENT			1JUL79 -30SEP79	1	80FEC/103/4663
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL79 -30SEP79	1	80FEC/105/0829
	YEAR END	148,178	169,713	1OCT79 -31DEC79	62	80FEC/104/5430
	TOTAL	265,254	0 263,428		144	TOTAL PAGES



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

8 January 1980

Mr. Gary Burman, Treasurer
Florida for Kennedy Committee (C99001091)
255 Alhambra Circle
Coral Gables, Florida 33134

Dear Mr. Burman:

This letter is prompted by the Commission's review of your July 10 and October 10, 1979 Reports of Receipts and Expenditures. The review indicated the receipt of an apparent prohibited contribution and that certain information required by the Federal Election Campaign Act and Regulations was omitted or in error. An itemization of this information follows.

On Schedule A for Line 14a, your October 10 Report discloses an apparent contribution from a labor organization, "District Council of New York City United Brotherhood of Carpenters & Joiners of America." You are advised that contributions from labor organizations are prohibited by 2 U.S.C. 441b, unless made from a separate segregated fund for voluntary contributions established by the labor organization. A copy of that portion of your report is attached so that a review of your records may be made.

The Commission recommends that if you have received a prohibited contribution, you refund the full amount to the donor. You should notify the Commission by letter immediately of your determination in this matter. The return of the contribution should be reported as a contribution refund on Schedule B for Line 21a on your next report of receipts and expenditures.

If you find that the source of the contribution is permissible under the Act, please submit a statement for the public record which would clarify the source and the exact nature of the account upon which the check was drawn. If the source of the contribution has been disclosed incompletely or incorrectly, please amend your original report.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, your prompt refund of the full amount to the donor will be taken into consideration.

11 C.F.R. 100.11 defines "occupation" to be the "principal job title and whether or not self-employed." 11 C.F.R. 100.12 defines "principal place of business" to be the "full name under which the business is conducted and the city and state in which the person is employed or conducts business." (Emphasis added). 2 U.S.C. 434(b)(2) requires disclosure of this information for each contributor who has contributed in excess of \$100 to the committee. Please amend your October 10 Report to provide the identification, (full name and full address), occupation and principal place of business for each such contributor.

Page Two.
Request for Additional Information.
July 10 and October 10, 1979 Reports.
Florida for Kennedy Committee (C99001091)

On Schedule B for Line 20a, your committee itemized expenditures to three individuals and listed the expenditures as "in-kind." Please amend your October 10 Report to identify the itemized contributions from these individuals as "in-kind" contributions as required under 11 C.F.R. 104.3.

2 U.S.C. 434(b)(9) requires disclosure of the identification of each person to whom expenditures have been made by or on behalf of the committee which is in excess of \$100, or in an amount less than \$100 if the total exceeds \$100 for the calendar year, together with the amount, date and particulars of each such expenditure. If persons to whom expenditures have been made are acting as agents on behalf of the committee, then the ultimate recipient(s) of those expenditures, along with the particulars of each such expenditure, must be disclosed in accordance with 2 U.S.C. 434(b)(9).

Please amend your July 10 Report to provide the identification, (full name and full mailing address), of recipients of expenditures made by the committee. Please also clarify the particulars of an expenditure made to Sergio Bendixen for "Moving Expense," i.e., is this a reimbursement for personal moving expense or a payment for services rendered on behalf of the committee?

Please amend your October 10 Report to provide the dates for all expenditures itemizable under 2 U.S.C. 434(b)(9).

Certain expenditures on the committee's October 10 Report have what appear to be unclear particulars of expenditures as applied to possible ultimate recipient(s). Please amend your October 10 Report to clarify the particulars of expenditures made to individuals for "Rent," i.e., did the individuals provide space to the committee or did they act as agents on behalf of the committee to secure space and pay any applicable rents?

In addition, while the terms "Consulting," "Travel" and "Advertising" may be acceptable under certain circumstances for descriptions of particulars of individual expenditures, a single expenditure for several purposes may be unclear. Also, particulars noted as "Consulting" and "Advertising" may be unclear as to the ultimate recipient(s) of the expenditures. Please amend your October 10 Report to clarify the particulars of, and if applicable, the ultimate recipient(s), of the following expenditures, (a possible need to clarify ultimate recipient is denoted by an "*"):

Holly Gewandter	\$ 401.75	"Reimbursed Expenses"
Camilla Bruce	\$ 164.64	" "
Katherine Odhay	\$ 365.00	" "
McPabitch Office	\$ 273.04	" "
Sergio Bendixen	\$12,206.44	"Consulting, Travel, Office Expense"
*D. Kennedy	\$ 2,113.92	" " " "
*Jim Flack	\$ 7,741.04	" " " "
Mike Abrams	\$ 1,375.49	"Travel, Office Exp., Advertising"

(continued)

Page Three.
 Request for Additional Information.
 July 10 and October 10, 1979 Reports.
 Florida for Kennedy Committee (C99001091)

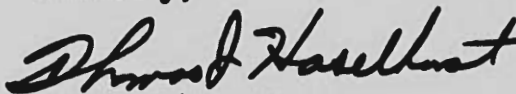
Project Masters	\$ 3,809.86	"Consulting, Advertising*, Office Exp."
Zale Koff	\$ 1,150.00	"Advertising"
Cheryl Wohl	\$ 1,498.12	"Consulting, Office Expense"
Millenium Group	\$ 1,002.21	"Reimbursed Expense, Advertising"
L. Robinson	\$ 1,300.00	"Consulting, Travel"
*Roy Mathis	\$ 2,014.35	" "

Your October 10 Report includes a Schedule C for a loan made to the committee, but the committee has failed to provide information on debts and obligations owed by the committee for Line 13 of the Summary Page. (A loan is an obligation which is reportable and should be included with all obligations on Line 13). Please amend your October 10 Report accordingly.

For your future reporting information, transfers from political committees should be itemized on a separate Schedule A for Line 15a or 15b and included in the totals for Line 15a or 15b of the Detailed Summary Schedule. (An amendment is not required for this statement).

Be advised that you must supply the Commission with the requested information within fifteen (15) days from the date of this letter. If you have any questions, contact Mike Thompson in our Reports Analysis Division on the toll free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,



Thomas J. Haselhorst
 Assistant Staff Director
 Reports Analysis Division

33040373817

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind, Other Income, Loans, Refunds)

Line Number 7

(Use Separate Schedules for each numbered line)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a of FEC FORM 3

Name of Candidate or Committee in Full

Florida For Kennedy Committee

Full Name, Mailing Address and ZIP Code Luch D. Thatcher 1520 Xanthus Lane Wayzata, Minnesota 55391	Principal Place of Business N/A Occupation Student	Date (month, day, year) 8/30/79	Amount of each Receipt this Period \$500.00
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00		
Full Name, Mailing Address and ZIP Code Paul Thatcher, Jr. 1520 Xanthus Lane Wayzata, Minnesota 55391	Principal Place of Business N/A Occupation Student	Date (month, day, year) 8/30/79	Amount of each Receipt this Period \$500.00
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00		
Full Name, Mailing Address and ZIP Code Paul J. Reingold 1764 S.W. 24 Terr. Miami, Fla. 33145	Principal Place of Business 825 S. Bayshore Dr. Tower 3, Suite 18-2 Miami, Fla. 33131 Occupation Merchant Banker	Date (month, day, year) 8/31/79	Amount of each Receipt this Period \$1,000.00
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,000.00		
Full Name, Mailing Address and ZIP Code Max Palevsky 924 Westwood Blvd. Suite 700 Los Angeles, Ca. 90024	Principal Place of Business 924 Westwood Blvd. Suite 700 Los Angeles, Ca. 90024 Occupation Industrialist	Date (month, day, year) 9/5/79	Amount of each Receipt this Period \$1,000.00
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,000.00		
Full Name, Mailing Address and ZIP Code Janet Skinner 905 6th St. S.W. Apt. 110 Washington, D.C. 20024	Principal Place of Business Information requested Occupation Information requested	Date (month, day, year) 9/6/79	Amount of each Receipt this Period \$500.00
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00		
Full Name, Mailing Address and ZIP Code District Council of New York City United Brotherhood of Carpenters & Joiners of America 204-8 E. 23 St. New York	Principal Place of Business 204-8 E. 23 St. New York, N.Y. Occupation Union	Date (month, day, year) 9/13/79	Amount of each Receipt this Period \$250.00
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00		
Full Name, Mailing Address and ZIP Code David Sher 1120 Park Ave. New York, N.Y. 10028	Principal Place of Business 61 Broadway New York, N.Y. 1006 Occupation Lawyer	Date (month, day, year) 9/13/79	Amount of each Receipt this Period \$250.00
Receipt for ☐ Primary ☐ General ☐ Other	☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00		

SUBTOTAL of receipts this page (optional) \$ 4,000.00
TOTAL this period (last page this line number only) \$

79031024065
89040873813

184

184

TELECON

ANALYST Mike Thompson
initiated call? _____

TELECON WITH: Gary Burman, Treasurer
initiated call? yes

Candidate/Committee: Florida for Kennedy Committee

DATE: 1-21-80

SUBJECT(S): RFAI & SV for July 10 and October 10 1979 Reports

3 3 0 4 0 3 7 5 8 1 9
Gary called to ask what the problem was with the labor organization contribution. He asked how he could find out if the contribution was from the segregated fund or from treasury funds. I suggested that he contact the labor organization and ask them. I stated that he should find out quickly and notify the Commission of the situation as soon as possible.

He stated that the request on Principal Place of Business could take thousands of dollars in phone calls; money and time that the committee does not have at this time. However, he did say that the committee had already spent a great deal of time and money in mailing each contributor confirmation letters and thank-you letters in which they requested any missing information. I suggested that he simply inform the Commission of this procedure and perhaps mail in a copy of the form letter that they send to contributors.

He said that for particulars, he wasn't sure what we wanted. I explained the requirements for ultimate recipient, whether as memo entries or as individual expenditure amounts. I also explained that the expenditures listed with several purposes should be broken down into amounts for each purpose; amounts that then had an ultimate recipient should be memo entries for the ultimate recipient.

I explained that each expenditure in excess of \$100, or aggregating in excess of \$100 to a recipient, must be itemized. He wanted to know if they could itemize a total amount, list the dates as "various" and then breakdown the amounts for each purpose. I said no, that the Act was clear in requiring the separate itemization. He really didn't like that at all . . . he said that the report may be several hundred pages if this were the case. All I could say was that that is the case - that the Act is clear.

He then said that he could not possibly respond in 15 days. I said that there was no provision for extensions - he still wanted one. I suggested that he send a letter explaining the labor contribution, answer as much of the request as possible and then indicate that he was working on the balance of the request - but that he should get at least the response on the labor contribution in as soon as possible.



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January 25, 1980

Mr. Mike Thompson
Federal Election Commission
Washington, D.C. 20463

Dear Mike:

This letter is being submitted in response to your letter of January 8, 1980 to the Florida For Kennedy Committee (FFKC) which was not actually received by the "FFKC" until January 19, 1980. The following responses are being made to the best of my knowledge and reflect the response of the "FFKC".

- 1) The correct mailing address of the "FFKC" is:
Florida For Kennedy Committee
c/o Mann & Safchik
255 Alhambra Circle Suite 412
Coral Gables, Florida 33134
- 2) The amended July 10, 1979 and October 10, 1979 Reports of Receipts And Expenditures are in the process of being amended by myself and the Assistant Treasurer of the "FFKC", Jeff Safchik. We shall forward these reports to your office immediately upon their completion.
- 3) All contributors (who gave in excess of \$100) to the "FFKC" were asked to comply with sections 2 U.S.C. 434 (b)(2), 11 C.F.R. 100.11 and 11 C.F.R. 100.12 in the form of our information request sheet (see exhibit "A"). We have sent this sheet to all contributors that have not furnished us with the information required in the above mentioned sections of the code.
- 4) The disbursement made to Sergio Bendixen for "Moving Expenses" represents an expense of the "FFKC" to get Mr. Bendixen to move to Florida and become the main consultant to the "FFKC" and coordinate the state activities for the "FFKC" and then move back

FLORIDA FOR KENNEDY COMMITTEE



Mike Thompson
January 25, 1980
Page 2

to Washington, D.C. after the October 13, 1979 Florida Democratic Caucus. This "Moving Expense" was part of the consultant fee paid to Mr. Bendixen for his services rendered.

- 5) All amounts indicated as rent on the October 10, 1979 report represent office space paid to the lessor of the office. No individual acted as an agent on behalf of the committee to secure space and pay any applicable rents.
- 6) The contribution by the District Council of New York City United Brotherhood of Carpenters & Joiners of America, was made from a separated segregated fund for voluntary contributions and not out of its regular operating fund. This contribution is acceptable, as made, according to the code.

As I previously stated, we are in the process of amending the July 10, 1979 and October 10, 1979 reports, making the necessary changes as advised by the Federal Election Commission. If you have any questions, I can be contacted at my office (305) 532-6451 ext. 420, during working hours.

Sincerely,

Gary S. Burman, Treasurer
Florida For Kennedy Committee

cc: Jeff Safchik

FLORIDA FOR KENNEDY COMMITTEE



Exhibit "A"

Dear

On behalf of the Florida for Kennedy Committee, I would like to thank you very much for your recent contribution. As you know, there are many reporting requirements the committee must make to the Federal Election Commission. Please assist us in our reporting by completing the following information and returning it as soon as possible. -

Name _____

Address _____

Present Occupation _____

Business Name and Address _____

Amount of Contribution _____

Please return this letter as soon as possible to:

Florida For Kennedy Committee
% Gary S. Burman
11202 S.W. 129 Place
Miami, Fl 33186

Very truly yours,

Gary S. Burman
Assistant Treasurer

FLORIDA FOR KENNEDY COMMITTEE

TELECON

ANALYST Mike Thompson
initiated call? _____

TELECON WITH: Gary Burman
initiated call? yes

(305) 532-6451 x420

Candidate/Committee: Florida for Kennedy Committee

DATE: 2-12-80'

SUBJECT(S): Amendments for previous reports

Gary called to see if the amendments should be complete copies of the previous reports or if only the amended information had to be submitted. I told him that only the amended information is necessary. I suggested that the cover letter explain which reports are being amended.

He said that each will be amended separately, so the cover letter will state which report and what information is being amended, (for each amendment).

33040373830



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

13 February 1980

Mr. Gary Burman, Treasurer
Florida for Kennedy Committee (C99001091)
% Mann & Safchick (Suite 412)
255 Alhambra Circle
Coral Gables, Florida 33134

Dear Mr. Burman:

On January 8, 1980, (and re-mailed January 16, 1980), you were notified that a review of your July 10 and October 10, 1979 Reports of Receipts and Expenditures indicated that certain information required by the Federal Election Campaign Act and Regulations was missing or in error.

Your January 30, 1980 response has been reviewed and determined to be incomplete because you have not provided all of the requested information. For your response to be considered adequate, the following information is still required:

On Schedule B for Line 20a, your committee itemized expenditures to three individuals and listed the expenditures as "in-kind." Please amend your October 10 Report to identify the itemized contributions from these individuals as "in-kind" as required under 11 C.F.R. 104.3.

2 U.S.C. 434(b)(9) requires disclosure of the identification of each person to whom an expenditure has been made by or on behalf of the committee which is in excess of \$100, or in an amount less than \$100 if the total exceeds \$100 for the calendar year, together with the amount, date and particulars of each such expenditure. If persons to whom expenditures have been made are acting as agents on behalf of the committee, then the ultimate recipient(s) of those expenditures, along with the particulars of each such expenditure, must be disclosed in accordance with 2 U.S.C. 434(b)(9).

Accordingly, please amend your July 10 Report to provide the identification, (full name and mailing address), of recipients of expenditures made by the committee. Please amend your October 10 Report to provide the dates for all expenditures itemizable under 2 U.S.C. 434(b)(9).

In addition, while the terms "Consulting," "Travel" and "Advertising" may be acceptable under certain circumstances for descriptions of particulars of individual expenditures, a single expenditure for several purposes may be unclear. Also, particulars noted as "Consulting" and "Advertising" may be unclear as to the ultimate recipient(s) of expenditures. Please amend your October 10 Report to clarify the particulars of, and if applicable, the ultimate recipient(s), of the following expenditures. (A possible need to clarify the ultimate recipient(s) is denoted by an "*"):

Page Two.

Second Notice - Request for Additional Information.

July 10 and October 10, 1979 Reports.

Florida for Kennedy Committee (C99001091)

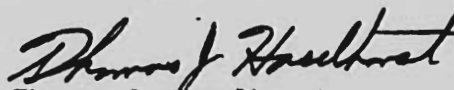
Holly Gewandter	\$= 401.75	"Reimbursed Expenses"
Camilla Bruce	\$ 164.64	" "
Katherine Odhay	\$ 365.00	" "
McPabitch Office	\$ 273.04	" "
Sergio Bendixen	\$12,206.44	"Consulting, Travel, Office Expense"
D. Kennedy	\$ 2,113.92	"Consulting, Travel, Office Expense"
*Jim Flack	\$ 7,714.04	" "
Mike Abrams	\$ 1,375.49	"Travel, Office Expense, Advertising"
Project Masters	\$ 3,809.86	"Consulting, Advertising*, Office Exp."
Zale Koff	\$ 1,150.00	"Advertising"
Cheryl Wohl	\$ 1,498.12	"Consulting, Office Expense"
Millenium Group	\$ 1,002.21	"Reimbursed Expense, Advertising"
L. Robinson	\$ 1,300.00	"Consulting, Travel"
*Roy Mathis	\$ 2,014.35	" "

Your October 10 Report includes a Schedule C for a loan made to the committee, but the committee has failed to provide information on debts and obligations owed by the committee for Line 13 of the Summary Page. (A loan is an obligation which is reportable and should be included with all obligations on Line 13). Please amend your October 10 Report accordingly.

Be advised that you must supply the Commission with the requested information within fifteen (15) days from the date of this notice. If no response is received, the Commission may choose to take legal action to insure compliance with the Act.

If you have any questions, contact Mike Thompson in our Reports Analysis Division on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

TELECON

ANALYST Mike Thompson
initiated call? yes

TELECON WITH: Mr. Gary Burman, Treasurer
initiated call?

Candidate/Committee: Florida for Kennedy Committee (C99001091)

DATE: 3-12-80

SUBJECT(s): Amendments to July 10 and October 10 Reports; Questions on YE, 1979

I called Mr. Burman to see how he was doing on the July 10 and October 10 amendments. (The committee has received an RFAI and a Second Notice on these reports).

He said that he was working on the amendments still and had completed a good portion of the work. Much of the material is in the process of being typed. However, he said that it may still be one to two weeks before any amendments may be submitted. He also said that much of the information is impossible to obtain.

He is very busy right now in his accounting work due to the time of year - tax time. He apologized for the delay but said that there was nothing he could do about it. He would simply continue to work on the response as time permits.

On the matter of the Year-End Report, I mentioned that I was mailing him an RFAI for questions we had on that report. I said that there were two possible corporate contributions we found and there were some other reporting discrepancies for 434 provisions. I outlined the problem with the possible corporate contributions and suggested that he contact the persons involved to verify the sources of the contributions. He will do so.

83040373836



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

12 March 1980

Mr. Gary Burman, Treasurer
Florida for Kennedy Committee (C99001091)
c/o Mr. Jeff Safchik
255 Alhambra Circle, Suite 412
Coral Gables, Florida 33134

Reference: 1979 Year-End Report (10/1/79 - 12/31/79)

Dear Mr. Burman:

This letter is prompted by the Commission's preliminary review of your 1979 Year-End Report. The review raised questions as to specific contributions and/or expenditures and to the reporting of certain information required by the Federal Election Campaign Act, (the Act). An itemization of these areas follows:

On Schedule A for Line 14a, your report discloses apparent contributions from corporations. You are advised that contributions from corporations are prohibited by 2 U.S.C. 441b unless made from a separate segregated fund established by the corporation for voluntary contributions from its employees. A copy of those portions of your report is attached so that a review of your records may be made.

The Commission recommends that if you have received prohibited contributions, you refund the full amounts to the donors. You should notify the Commission immediately of your determination in this matter. The returns of the contributions should be reported immediately by letter and should be disclosed as contribution refunds on Schedule B on your next report of receipts and expenditures.

If you find that the sources of these contributions are permissible under the Act, please submit a statement for the public record which would clarify the sources and the exact nature of the accounts upon which the checks were drawn. If the sources of the contributions have been disclosed incompletely or incorrectly, please amend your original report.

On Schedule A for Line 14a, your report discloses a contribution from McCandles and Barrett Partnership. 11 C.F.R. 110.1(e) requires that contributions from a partnership must be generally attributed to each partner in direct proportion to his or her share of the partnership profits. However, if the partners participating in the partnership contribution have agreed that the contribution should be attributed in another manner, the contribution should then be reported according to that agreement. Full name, mailing address, occupation and principal place of business as well as the amount of contribution of each partner must be provided if the amount per partner exceeds \$100. Please amend your report to properly attribute the partnership contribution to the individual partners.

83040373857

Page Two.
Request for Additional Information.
Florida for Kennedy Committee (C99001091)
1979 Year-End Report.

11 C.F.R. 100.12 defines "principal place of business" to be the "full name under which the business is conducted and the city and state in which the person is employed or conducts business." 2 U.S.C. 434(b)(2) requires disclosure of the occupation and principal place of business for each contributor who has contributed in excess of \$100. Please amend your Year-End Report to provide the principal place of business for each such contributor.

On the committee's October 10 Report, a loan from Mr. Peter Bittenweiser was disclosed in the amount of \$2,000. The committee's Year-End Report does not include itemization for repayment of this loan and does not include Schedule C for debts and obligations. Please amend your report to provide Schedule C for this obligation owed by the committee and amend your Summary Page to reflect the total amount owed by the committee.

An amendment to your original report correcting the above matters, and your statement concerning the apparent corporate contributions, should be filed with the Commission within fifteen (15) days of the date of this notice. If you need assistance, please contact Mike Thompson on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

8304037388

DUPLICATE

Rev. 1978

Federal Election Commission

K Street, N.W.

Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 11 of 19 for

Line Number 14(a)

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Florida for Kennedy Committee

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Kenneth Hudson 70 Union St. Medford, Mass 02155	70 Union St. Medford, Mass 02155 Occupation Executive	10/9/79	\$500.00
Receipt for: ☐ Primary ☐ General ☒ Other			
☐ Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 500.00			
Michael V. Forrestal 25 Central Park West New York, NY	53 Wall Street New York, NY 10005 Occupation Attorney	10/9/79	\$500.00
Receipt for: ☐ Primary ☐ General ☒ Other			
☐ Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 500.00			
Howard Hiren 75 N. Federal Highway Dania, FL 33004	324 S.E. 10th St. Dania, FL 33024 Occupation Antique Dealer	10/9/79	\$1,000.00
Receipt for: ☐ Primary ☐ General ☒ Other			
☐ Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 2,000.00			
Bill Sinclair 7431 Arthur St. Hollywood, FL 33021	7431 Arthur St. Hollywood, FL 33021 Occupation Executive	10/9/79	\$1,000.00
Receipt for: ☐ Primary ☐ General ☒ Other			
☐ Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 1,000.00			
Henson, Hopkins & Shipley 402 West 7th St. Austin, TX 78701 INC. 1-3-79	402 West 7th St. Austin, Texas Occupation Attorneys	10/9/79	\$500.00
Receipt for: ☐ Primary ☐ General ☒ Other			
☐ Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 500.00			
Anne F. Platt 3871 N.W. 100 Ave. Coral Springs, FL 33065	N/A Occupation Housewife	10/9/79	\$600.00
Receipt for: ☐ Primary ☐ General ☒ Other			
☐ Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 700.00			
Peter Dalton 1591 Lane Ave., S. Jacksonville, FL 32210	1591 Lane Ave., South Jacksonville, FL 32210 Occupation Attorney	10/9/79	\$300.00
Receipt for: ☐ Primary ☐ General ☒ Other			
☐ Check if Contributor is self-employed			
Aggregate Year-To-Date ... \$ 300.00			

SUBTOTAL of receipts this page (optional) \$ 5,400.00

TOTAL this period (last page this line number only) \$

DUPLICATE
S
at Election Commission
K Street, N.W.
ngton, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3
" Contribution in Kind "

Page 19 of 19 for
Line Number 14(a)

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Florida for Kennedy Committee

Full Name, Mailing Address and ZIP Code

~~Ramon Flores~~
1230 16th Ct.
Largo, FL 33540

Principal Place of Business

Patriotic Krewe of
Largo, FL

Date (month,
day, year)
10/6/79

Amount of each Receipt
this Period
\$190.68

Occupation

Executive Director

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 190.68

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

~~Automized Type Systems~~
400 Hialeah Drive
Hialeah, FL 33010

Principal Place of Business

Hialeah, FL

Date (month,
day, year)
10/9/79

Amount of each Receipt
this Period
\$185.36

Occupation

Type Setter

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 185.36

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

~~Roy Mathis~~
1618 Keith St.
Tallahassee, FL 32304

Principal Place of Business

P.O. Box 512
Tallahassee, FL 32304

Date (month,
day, year)
10/13/79

Amount of each Receipt
this Period
\$949.60

Occupation

Political Consultant

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

~~Gary Burman~~
11202 S.W. 129th Place
Miami, FL 33186

Principal Place of Business

11202 S.W. 129th Place
Miami, FL 33186

Date (month,
day, year)
12/27/79

Amount of each Receipt
this Period
\$200.00

Occupation

Banker

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 200.00

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

~~Irving Azott~~
8380 Milrose Avenue
Los Angeles, California 90069

Principal Place of Business

8380 Milrose Avenue
Los Angeles, California 90069

Date (month,
day, year)
10/6/79

Amount of each Receipt
this Period
\$1,000.00

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$1,000.00

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

~~Mike Jones~~
19 Linden Street
Allstone, Massachusetts 02134

Principal Place of Business

19 Linden Street
Allstone, Mass. 02134

Date (month,
day, year)
10/6/79

Amount of each Receipt
this Period
\$416.00

Occupation

Student

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ 416.00

Receipt for

☐ Primary

☐ General

☒ Other

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Receipt for

☐ Primary

☐ General

☐ Other

SUBTOTAL of receipts this page (optional)

\$ 2,941.64

TOTAL this period (last page this line number only)

\$ 131,967.64

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE March 28, 1980 ANALYST Mike Thompson
TO: OGC TEAM CHIEF Irene Allen
ATTENTION: COMPLIANCE REVIEW CB
THROUGH: STAFF DIRECTOR OBP.
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS EAH

MUR No. Not yet assignedDATE OF ORIGINAL REFERRAL 3-21-80

**PURPOSE:

The attached amendment to the Florida for Kennedy Committee's July 10 Report was received March 19, 1980. The amendment provides contributor information for two contributors and some addresses for recipients of expenditures.

This response is not complete as all of the requests have still not been answered. Also, no dates have been yet provided for expenditures.

3 3 0 4 0 3 7 3 8 6 1
OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

RECEIVED
FEDERAL ELECTION
COMMISSION

'80 MAR 19 PM 12:26


KENNEDY
'80

March 17, 1980

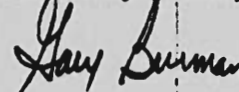
Mr. Michael Thompson
Federal Election Commission
1325 K. Street N.W.
Washington, D.C. 20463

Dear Mike:

Enclosed you will find amended information from the July 10, 1979 Quarterly Report of Receipts and Disbursements. You will note the disbursement changes include all the addresses that were previously missing. The receipt changes include the addresses of two individuals that were previously missing on the original filing. All other previously reported information remains the same.

In filing these amendments to the July 10, 1979 Report, the Florida for Kennedy Committee does not waive its contention that the act of a draft committee is in no way regulated by the Federal Election Campaign Act.

Sincerely yours,



Gary Burman, Treasurer
Florida For Kennedy Committee

GB/sg
Enc.

FLORIDA FOR KENNEDY COMMITTEE

PD. FOR BY FLA. FOR KENNEDY COMM. and not authorized by any candidate. A copy of our report is filed with and available for purchase from F.E.C., Washington, D.C.

0803034100367338233

SCHEDULE B

January, 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

RECEIVED
FEDERAL ELECTION
COMMISSION

Page _____ of _____ for

Line Number _____

60 MAR 26 AMENDED 26
(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

FLORIDA FOR KENNEDY COMMITTEE

Full Name, Mailing Address and ZIP Code
A & R Sales
940 Lincoln Road
Miami Beach, Fla. 33140

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Federal Express
1410 N.W. 78 Avenue
Miami, Fla. 33155

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Mike Abrams
1480 N.W. 193 Street
Miami, Florida 33169

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Paul D. Friedman
10801 S.W. 134 Place
Miami, Fla. 33186

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Bruce Rogow
18450 S.W. 212 Street
Miami, Florida

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Sergio Bendixen
1471 N.W. 194 Street
Miami, Florida 33169

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Esquire Travel Agency
119 S.W. 2nd Avenue
Miami, Florida 33140

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code
Ramada Inn
101 Anson Blvd.
Hallandale, Florida

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

SUBTOTAL of expenditures this page (optional)

\$

TOTAL this period (last page this line number only)

\$

SCHEDULE B

REVISED

January 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page _____ of _____ for

Line Number _____

AMENDED
(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

FLORIDA FOR KENNEDY COMMITTEE

Full Name, Mailing Address and ZIP Code

Jim Flack
P. O. Box 12751
Tallahassee, Florida

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Fla. Systems Management
3550 Biscayne Blvd.
Miami, Florida

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

SUBTOTAL of expenditures this page (optional)

\$

TOTAL this period (last page this line number only)

\$

**(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)**

**Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3**

AMENDED
(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full			
FLORIDA FOR KENNEDY COMMITTEE			
Full Name, Mailing Address and ZIP Code Ted Ashley 1286 Lago Usta Dr. Beverly Hills, Ca. 90210	Principal Place of Business Warner Bros., Inc. Burbank, California 91522	Date (month, day, year) 6/8/79	Amount of each Receipt this Period \$1,000.00
Occupation President			
Receipt for: ☐ Primary ☐ General ☒ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$ 1,000.00			
Full Name, Mailing Address and ZIP Code Norman Lear 255 Chapbourne Los Angeles, Ca. 90049	Principal Place of Business 1901 Ave. of the Stars Los Angeles, California	Date (month, day, year) 6/8/79	Amount of each Receipt this Period \$1,000.00
Occupation Producer			
Receipt for: ☐ Primary ☐ General ☒ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$ 1,000.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
	Occupation		
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date . . . \$			
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Gary Burman, Treasurer
Florida for Kennedy Committee
255 Alhambra Circle
Coral Gables, Florida 33134

Re: MUR 1229

Dear Mr. Burman:

The Federal Election Commission notified you in letters dated January 8, 1980, and February 13, 1980, that your committee may have violated section 434(b)(5)(A) (formerly § 434(b)(9)) of the Federal Election Campaign Act of 1971, as amended ("the Act").

Upon further review of the information available to the Commission and information supplied by you, the Commission determined, on , 1980, that there is reason to believe that your committee violated 2 U.S.C. § 434(b)(5)(A). A report on the Commission's finding is attached for your information. You may submit any factual or legal materials which you believe are relevant to the Commission's analysis of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against your committee, the Commission may find probable cause to believe that a violation has occurred, and proceed with formal conciliation. Of course, this does not preclude the settlement of this matter through informal conciliation prior to a finding of probable cause to believe if you so desire.

This matter will remain confidential in accordance with 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A) (formerly § 437g(a)(3)(B)) unless you notify the Commission in writing that you wish the matter to be made public.

If you have any questions, please contact Maura White, the staff member assigned to this matter at 202/523-4060.

Sincerely,

Enclosure

83040373866

FEDERAL ELECTION COMMISSION

NOTIFICATION OF REASON TO BELIEVE FINDING

DATE _____

MUR NO. 1229
STAFF MEMBER(S) & TEL. NO.
M. White/ D. Branch

RESPONDENT Florida for Kennedy

202/523-4060

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

BACKGROUND

On March 21, 1980, the Reports Analysis Division ("RAD") referred the name of the Florida for Kennedy Committee ("Committee") to the Office of General Counsel for failure to provide complete information regarding the reporting of expenditures in violation of 2 U.S.C. § 434(b)(5)(A) (former 2 U.S.C. § 434(b)(9)). The July 10, 1979, and October 10, 1979, quarterly reports filed by the committee omitted, in some instances, the addresses of persons to whom expenditures were made and the dates of the expenditures, and failed to properly report the particulars of certain expenditures as well as the ultimate recipients of those expenditures.

FACTUAL BASIS AND LEGAL ANALYSIS

On January 8, 1980, RAD mailed a request for additional information ("RFAI") to the Committee in regard to its failure to provide the identification of the recipients of expenditures (full name and full mailing address) on its July 10, 1979, quarterly report, and its failure to report the dates of all expenditures as well as the ultimate recipient and itemized particulars of certain expenditures on its October 10, 1979, quarterly report. The Committee responded to the RFAI by both telephone and letter on January 21, 1980, and January 30, 1980, respectively. The committee's January 30 response stated that both the July 10 and October 10 quarterly reports were in the process of being amended, and that they would be filed upon completion. This response was deemed inadequate by the Commission

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and on February 13, 1980, a second notice was mailed to the committee. On March 12, 1980, RAD telephoned the committee treasurer to inquire as to the status of amendments to the July 10 and October 10 quarterly reports. The treasurer responded that a portion of the work had been completed, but that it would not be possible to obtain much of the information.

On March 19, 1980, the committee filed an amendment to the July 10, 1979, quarterly report. This amendment supplied the addresses of all persons to whom expenditures had been made during this reporting period. As the committee did provide the previously omitted addresses, this filing is a satisfactory response in regard to expenditure information. To date, however, the committee has not amended their October 10 report to reflect previously omitted information. This report is still deficient in the reporting of all dates that expenditures were made, and clarification is needed as to the ultimate recipient of certain expenditures as well as the particulars of certain expenditures.

2 U.S.C. § 434(b)(5)(A) (former § 434(b)(9)) requires that each report filed contain the identification of each person to whom expenditures have been made within the calendar year in an aggregate amount or value in excess of \$200, and the amount, date, and purpose of each such expenditure. ^{1/} 2 U.S.C. § 431(j) (recodified at § 431(l3)) defines identification to mean, in the case of an individual, his full name and full address of his principal place of residence; in the case of a person it is defined to mean the full name and address of such person.

Based on the foregoing analysis, the Federal Election Commission has found:

1. Reason to believe that the Florida for Kennedy Committee violated 2 U.S.C. § 434(b)(5)(A) (former 2 U.S.C. § 434(b)(9)).

^{1/} Prior to the 1979 amendments to the Act, expenditures in an aggregate amount or value in excess of \$100 within the calendar year were required to be itemized. The change in the amount required to be itemized, however, does not affect the expenditures involved in this matter.

REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE March 28, 1980 ANALYST Mike Thompson
TO: OGC TEAM CHIEF Irene Allen
ATTENTION: COMPLIANCE REVIEW eb
THROUGH: STAFF DIRECTOR OBP
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS CPH

MUR No. Not yet assigned DATE OF ORIGINAL REFERRAL 3-21-80

**PURPOSE:

The attached amendment to the Florida for Kennedy Committee's July 10 Report was received March 19, 1980. The amendment provides contributor information for two contributors and some addresses for recipients of expenditures.

This response is not complete as all of the requests have still not been answered. Also, no dates have been yet provided for expenditures.

OUTCOME: (if applicable)

*Commission unit which initiated original Referral (e.g. AUDIT/RAD/OGC).

**INFORMATION, or RESULTS OF RAD ACTION, as appropriate.

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RECEIVED
FEDERAL ELECTION
COMMISSION

'80 MAR 19 PM 12:26

March 17, 1980

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

Dear Mike:

Enclosed you will find amended information from the July 10, 1979 Quarterly Report of Receipts and Disbursements. You will note the disbursement changes include all the addresses that were previously missing. The receipt changes include the addresses of two individuals that were previously missing on the original filing. All other previously reported information remains the same.

In filing these amendments to the July 10, 1979 Report, the Florida for Kennedy Committee does not waive its contention that the act of a draft committee is in no way regulated by the Federal Election Campaign Act.

Sincerely yours,

Gary Burman, Treasurer
Florida For Kennedy Committee

GB/sg
Enc.

FLORIDA FOR KENNEDY COMMITTEE

PD. FOR BY FLA. FOR KENNEDY COMM. and not authorized by any candidate. A copy of our report is filed with and available for purchase from F.E.C., Washington, D.C.

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)

Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

RECEIVED
FEDERAL ELECTION
COMMISSION

Page _____ of _____ for

Line Number _____

60 MAR 1978
AMENDED: 26
(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

FLORIDA FOR KENNEDY COMMITTEE

Full Name, Mailing Address and ZIP Code

A & R Sales
940 Lincoln Road
Miami Beach, Fla. 33140

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Federal Express
1410 N.W. 78 Avenue
Miami, Fla. 33155

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Mike Abrams
1480 N.W. 193 Street
Miami, Florida 33169

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Paul D. Friedman
10801 S.W. 134 Place
Miami, Fla. 33186

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Bruce Rogow
18450 S.W. 212 Street
Miami, Florida

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Sergio Bendixen
1471 N.W. 194 Street
Miami, Florida 33169

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Esquire Travel Agency
119 S.W. 2nd Avenue
Miami, Florida 33140

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Ramada Inn
101 Anson Blvd.
Hallandale, Florida

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

SUBTOTAL of expenditures this page (optional)

\$

TOTAL this period (last page this line number only)

\$

3003910733214

SCHEDULE B

REVISED

January, 1978

Federal Election Commission

1325 K Street, N.W.

Washington, D.C. 20463

ITEMIZED EXPENDITURES

(Operating, Transfers Out, Contributions In-Kind,
Loans, Loan Repayments and Refunds Made)
Supporting Lines 20a, 21a, and 22a, 22b, and 22c
of FEC FORM 3

Page _____ of _____ for

Line Number _____

AMENDED
(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

FLORIDA FOR KENNEDY COMMITTEE

Full Name, Mailing Address and ZIP Code

Jim Flack
P. O. Box 12751
Tallahassee, Florida

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Fla. Systems Management
3550 Biscayne Blvd.
Miami, Florida

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

Full Name, Mailing Address and ZIP Code

Particulars of Expenditure

Date (month,
day, year)

Amount of each expendi-
ture this period

Expenditure for:

☐ Primary ☐ General ☐ Other

SUBTOTAL of expenditures this page (optional)

\$

TOTAL this period (last page this line number only)

\$

30-00410-07-3322-5

SCHEDULE A

REVISED

January, 1978

Federal Election Commission

25 K Street, N.W.

Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page _____ of _____ for _____

Line Number _____

AMENDED
(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

FLORIDA FOR KENNEDY COMMITTEE

Full Name, Mailing Address and ZIP Code Ted Ashley 1286 Lago Vista Dr. Beverly Hills, Ca. 90210	Principal Place of Business Warner Bros., Inc. Burbank, California 91522 Occupation President	Date (month, day, year) 6/8/79	Amount of each Receipt this Period \$1,000.00
Receipt for: ☐ Primary ☐ General ☒ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 1,000.00			
Full Name, Mailing Address and ZIP Code Norman Lear 255 Chapbourne Los Angeles, Ca. 90049	Principal Place of Business 1901 Ave. of the Stars Los Angeles, California Occupation Producer	Date (month, day, year) 6/8/79	Amount of each Receipt this Period \$1,000.00
Receipt for: ☐ Primary ☐ General ☒ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$ 1,000.00			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Occupation			
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed	
Aggregate Year-To-Date ... \$			
SUBTOTAL of receipts this page (optional)			\$
TOTAL this period (last page this line number only)			\$

REF TO INSTRUCTIONS ON REVERSE SIDE BEFORE COMPLETING
DATE 33040387
MARCH 21, 1980
TO: STAFF DIRECTOR
THROUGH: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS
FROM: ANALYST
TEAM CHIEF
COMPLIANCE REVIEW
RAD 666
804-62

CANDIDATE/COMMITTEE: Florida for Kennedy
TREASURER: Mr. Gary Burman
ADDRESS: c/o Jeff Safcheck 255 Alhambra Circle, Suite 412
Coral Gables, Florida 33134

AFFILIATE(S):
ALLEGATION(S): Failure to disclose identification of persons to whom expenditures have been made; failure to disclose dates of expenditures. 2 U.S.C. 434(b)(9)
DATE INITIATED: CITE:
MANNER IN WHICH REVIEW WAS INITIATED:
☒ Normal Review
☐ Special Project
☐ Other:
ATTACHMENT(S)

REPORTS: All reports within the dates listed below have received initial basic review. For all reports reviewed, see Attachment 1.
PERIOD COVERED FROM May 22, 1979 TO September 30, 1979
TOTAL RECEIPTS \$ 117,076
CASH ON HAND \$ 23,360 (as of 9/30/79) TOTAL EXPENDITURES \$ 93,715
HISTORY: DEBTS \$ 2,000 (From Schedule C)

RESULTS OF REVIEW:
RFAI dated 8 January 1980 for July 10 and October 10 Reports
July 10 and October 10 Amendment received 30 January (Inadequate)
Second Notice Letter for July 10 and October 10 Reports
COMMUNICATIONS WITH CANDIDATE/COMMITTEE:
Telecon with Mr. Gary Burman, Treasurer, January 21, 1980
Telecon with Mr. Burman, February 12, 1980
Telecon with Mr. Burman, March 12, 1980
REASON(S) FOR REFERRAL:
Failure to respond adequately to RFAI

OTHER PENDING ACTIONS INITIATED BY RAD:
RFAI & SV for Year-End Report - Corporate contributions
OTHER RELEVANT INFORMATION:
PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

ADDENDUM TO FLORIDA FOR KENNEDY:

The committee's October 10 Report contained a cover letter stating that the treasurer was aware of the deficiency in disclosure of expenditures. The dates for expenditures had been omitted. This letter was dated October 9, 1979.

The Request for Additional Information was mailed January 8, 1980. The RFAI also requested identification of persons to whom expenditures had been made along with a breakdown of expenditures to persons for several purposes. To date, no response has been received on these matters. (The amendment dealt with other matters in the RFAI).

The July 10 Report contained an omission rate of 53% for Principal Place of Business, (out of 15 contributors). The October 10 Report, however, had 126 itemizable contributors out of which 29% of the occupations were missing and 78% of the principal places of business were missing or inadequate. Most of the schedules contained a notation that the information was requested. The RFAI requested the information for the October 10 Report.

The committee's response was that each contributor has been mailed a request for the information and a copy of that letter. This was considered to be adequate at the time as the committee appeared to be making some effort to obtain the information.

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FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)
83040873876
INDEPENDENT EXPENDITORS

DATE 7MAR80
PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS	EXPENDITURES	COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
FLORIDA FOR KENNEDY COMMITTEE						ID #C99001091
	1979 STATEMENT OF ORGANIZATION			22MAY79	5	79FEC/128/0319
	MISCELLANEOUS REPORT			4JUN79 FROM FEC	2	79FEC/128/2867
	MISCELLANEOUS REPORT			13JUN79 TO FEC	2	79FEC/101/3121
	STATEMENT OF ORGANIZATION - AMENDMENT			2JUL79	4	79FEC/101/3451
	STATEMENT OF ORGANIZATION - AMENDMENT			9JUL79	8	79FEC/101/5122
	STATEMENT OF ORGANIZATION - AMENDMENT			22OCT79	4	79FEC/103/0473
	STATEMENT OF ORGANIZATION - AMENDMENT			28DEC79	4	79FEC/103/2203
	JULY 10 QUARTERLY	12,535	6,012	22MAY79 -30JUN79	8	79FEC/101/5130
	REQUEST FOR ADDITIONAL INFORMATION			22MAY79 -30JUN79	3	80FEC/103/2465
	JULY 10 QUARTERLY - AMENDMENT			22MAY79 -30JUN79	4	80FEC/103/4284
	REQUEST FOR ADDITIONAL INFORMATION 2ND			22MAY79 -30JUN79	2	80FEC/105/0
	OCTOBER 10 QUARTERLY	104,541	87,703	1JUL79 -30SEP79	33	79FEC/102/4080
	REQUEST FOR ADDITIONAL INFORMATION			1JUL79 -30SEP79	1	80FEC/103/2551
	OCTOBER 10 QUARTERLY - AMENDMENT			1JUL79 -30SEP79	1	80FEC/103/4663
	REQUEST FOR ADDITIONAL INFORMATION 2ND			1JUL79 -30SEP79	1	80FEC/105/0829
	YEAR END	148,178	169,713	1OCT79 -31DEC79	62	80FEC/104/5430
	TOTAL	265,254	0 263,428		0	144 TOTAL PAGES



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

8 January 1980

Mr. Gary Burman, Treasurer
Florida for Kennedy Committee (C99001091)
255 Alhambra Circle
Coral Gables, Florida 33134

Dear Mr. Burman:

This letter is prompted by the Commission's review of your July 10 and October 10, 1979 Reports of Receipts and Expenditures. The review indicated the receipt of an apparent prohibited contribution and that certain information required by the Federal Election Campaign Act and Regulations was omitted or in error. An itemization of this information follows.

On Schedule A for Line 14a, your October 10 Report discloses an apparent contribution from a labor organization, "District Council of New York City United Brotherhood of Carpenters & Joiners of America." You are advised that contributions from labor organizations are prohibited by 2 U.S.C. 441b, unless made from a separate segregated fund for voluntary contributions established by the labor organization. A copy of that portion of your report is attached so that a review of your records may be made.

The Commission recommends that if you have received a prohibited contribution, you refund the full amount to the donor. You should notify the Commission by letter immediately of your determination in this matter. The return of the contribution should be reported as a contribution refund on Schedule B for Line 21a on your next report of receipts and expenditures.

If you find that the source of the contribution is permissible under the Act, please submit a statement for the public record which would clarify the source and the exact nature of the account upon which the check was drawn. If the source of the contribution has been disclosed incompletely or incorrectly, please amend your original report.

Although the Commission may take further legal steps concerning the acceptance of prohibited contributions, your prompt refund of the full amount to the donor will be taken into consideration.

11 C.F.R. 100.11 defines "occupation" to be the "principal job title and whether or not self-employed." 11 C.F.R. 100.12 defines "principal place of business" to be the "full name under which the business is conducted and the city and state in which the person is employed or conducts business." (Emphasis added). 2 U.S.C. 434(b)(2) requires disclosure of this information for each contributor who has contributed in excess of \$100 to the committee. Please amend your October 10 Report to provide the identification, (full name and full address), occupation and principal place of business for each such contributor.

Page Two.
Request for Additional Information.
July 10 and October 10, 1979 Reports.
Florida for Kennedy Committee (C99001091)

On Schedule B for Line 20a, your committee itemized expenditures to three individuals and listed the expenditures as "in-kind." Please amend your October 10 Report to identify the itemized contributions from these individuals as "in-kind" contributions as required under 11 C.F.R. 104.3.

2 U.S.C. 434(b)(9) requires disclosure of the identification of each person to whom expenditures have been made by or on behalf of the committee which is in excess of \$100, or in an amount less than \$100 if the total exceeds \$100 for the calendar year, together with the amount, date and particulars of each such expenditure. If persons to whom expenditures have been made are acting as agents on behalf of the committee, then the ultimate recipient(s) of those expenditures, along with the particulars of each such expenditure, must be disclosed in accordance with 2 U.S.C. 434(b)(9).

Please amend your July 10 Report to provide the identification, (full name and full mailing address), of recipients of expenditures made by the committee. Please also clarify the particulars of an expenditure made to Sergio Bendixen for "Moving Expense," i.e., is this a reimbursement for personal moving expense or a payment for services rendered on behalf of the committee?

Please amend your October 10 Report to provide the dates for all expenditures itemizable under 2 U.S.C. 434(b)(9).

Certain expenditures on the committee's October 10 Report have what appear to be unclear particulars of expenditures as applied to possible ultimate recipient(s). Please amend your October 10 Report to clarify the particulars of expenditures made to individuals for "Rent," i.e., did the individuals provide space to the committee or did they act as agents on behalf of the committee to secure space and pay any applicable rents?

In addition, while the terms "Consulting," "Travel" and "Advertising" may be acceptable under certain circumstances for descriptions of particulars of individual expenditures, a single expenditure for several purposes may be unclear. Also, particulars noted as "Consulting" and "Advertising" may be unclear as to the ultimate recipient(s) of the expenditures. Please amend your October 10 Report to clarify the particulars of, and if applicable, the ultimate recipient(s), of the following expenditures, (a possible need to clarify ultimate recipient is denoted by an "*"):

Holly Gewandter	\$ 401.75	"Reimbursed Expenses"
Camilla Bruce	\$ 164.64	" "
Katherine Odhay	\$ 365.00	" "
McPabitch Office	\$ 273.04	" "
Sergio Bendixen	\$12,206.44	"Consulting, Travel, Office Expense"
*D. Kennedy	\$ 2,113.92	" " " "
*Jim Flack	\$ 7,741.04	" " " "
*Mike Abrams	\$ 1,375.49	"Travel, Office Exp., Advertising"

(continued)

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Page Three.
 Request for Additional Information.
 July 10 and October 10, 1979 Reports.
 Florida for Kennedy Committee (C99001091)

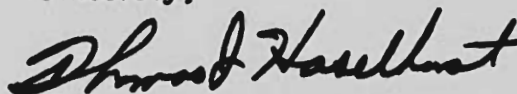
Project Masters	\$ 3,809.86	"Consulting, Advertising*, Office Exp."
Zale Koff	\$ 1,150.00	"Advertising"
Cheryl Wohl	\$ 1,498.12	"Consulting, Office Expense"
Millenium Group	\$ 1,002.21	"Reimbursed Expense, Advertising"
L. Robinson	\$ 1,300.00	"Consulting, Travel"
*Roy Mathis	\$ 2,014.35	" "

Your October 10 Report includes a Schedule C for a loan made to the committee, but the committee has failed to provide information on debts and obligations owed by the committee for Line 13 of the Summary Page. (A loan is an obligation which is reportable and should be included with all obligations on Line 13). Please amend your October 10 Report accordingly.

For your future reporting information, transfers from political committees should be itemized on a separate Schedule A for Line 15a or 15b and included in the totals for Line 15a or 15b of the Detailed Summary Schedule. (An amendment is not required for this statement).

Be advised that you must supply the Commission with the requested information within fifteen (15) days from the date of this letter. If you have any questions, contact Mike Thompson in our Reports Analysis Division on the toll free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,



Thomas J. Haselhorst
 Assistant Staff Director
 Reports Analysis Division

83040375879

1978
Election Commission
1100 A Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(C) Contributions, Transfers, Contribution In-K
Other Income, Loans, Refunds)

Line Number _____

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Florida For Kennedy Committee

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Luch D. Thatcher 1520 Xanthus Lane Wayzata, Minnesota 55391	N/A Occupation Student	8/30/79	\$500.00
Receipt for ☐ Primary ☐ General ☐ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
Paul Thatcher, Jr. 1520 Xanthus Lane Wayzata, Minnesota 55391	N/A Occupation Student	8/30/79	\$500.00
Receipt for ☐ Primary ☐ General ☐ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
Paul J. Reingold 1764 S.W. 24 Terr. Miami, Fla. 33145	825 S. Bayshore Dr. Tower 3, Suite 18-2 Miami, Fla. 33131 Occupation Merchant Banker	8/31/79	\$1,000.00
Receipt for ☐ Primary ☐ General ☐ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,000.00			
Max Palevsky 924 Westwood Blvd. Suite 700 Los Angeles, Ca. 90024	924 Westwood Blvd. Suite 700 Los Angeles, Ca. 90024 Occupation Industrialist	9/5/79	\$1,000.00
Receipt for ☐ Primary ☐ General ☐ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,000.00			
Janet Skinner 905 6th St. S.W. Apt. 110 Washington, D.C. 20024	Information requested Occupation Information requested	9/6/79	\$500.00
Receipt for ☐ Primary ☐ General ☐ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
District Council of New York City United Brotherhood of Carpenters & Joiners of America 204-8 E. 23 St. New York	204-8 E. 23 St. New York, N.Y. Occupation Union	9/13/79	\$250.00
Receipt for ☐ Primary ☐ General ☐ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00			
David Sher 1120 Park Ave. New York, N.Y. 10028	61 Broadway New York, N.Y. 1006 Occupation Lawyer	9/13/79	\$250.00
Receipt for ☐ Primary ☐ General ☐ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 250.00			
SUBTOTAL of receipts this page (optional)			\$ 4,000.00
TOTAL this period (last page this line number only)			\$

79031024063
8/30/79
1864

948

TELECON

ANALYST Mike Thompson
initiated call? _____

TELECON WITH: Gary Burman, Treasurer
initiated call? yes

Candidate/Committee: Florida for Kennedy Committee

DATE: 1-21-80

SUBJECT(S): RFAI & SV for July 10 and October 10 1979 Reports

8 3 0 4 0 6 7 3 1
Gary called to ask what the problem was with the labor organization contribution. He asked how he could find out if the contribution was from the segregated fund or from treasury funds. I suggested that he contact the labor organization and ask them. I stated that he should find out quickly and notify the Commission of the situation as soon as possible.

He stated that the request on Principal Place of Business could take thousands of dollars in phone calls; money and time that the committee does not have at this time. However, he did say that the committee had already spent a great deal of time and money in mailing each contributor confirmation letters and thank-you letters in which they requested any missing information. I suggested that he simply inform the Commission of this procedure and perhaps mail in a copy of the form letter that they send to contributors.

He said that for particulars, he wasn't sure what we wanted. I explained the requirements for ultimate recipient, whether as memo entries or as individual expenditure amounts. I also explained that the expenditures listed with several purposes should be broken down into amounts for each purpose; amounts that then had an ultimate recipient should be memo entries for the ultimate recipient.

I explained that each expenditure in excess of \$100, or aggregating in excess of \$100 to a recipient, must be itemized. He wanted to know if they could itemize a total amount, list the dates as "various" and then breakdown the amounts for each purpose. I said no, that the Act was clear in requiring the separate itemization. He really didn't like that at all . . . he said that the report may be several hundred pages if this were the case. All I could say was that that is the case - that the Act is clear.

He then said that he could not possibly respond in 15 days. I said that there was no provision for extensions - he still wanted one. I suggested that he send a letter explaining the labor contribution, answer as much of the request as possible and then indicate that he was working on the balance of the request - but that he should get at least the response on the labor contribution in as soon as possible.



CO JAN 30 PM 12 40

January 25, 1980

Mr. Mike Thompson
Federal Election Commission
Washington, D.C. 20463

Dear Mike:

This letter is being submitted in response to your letter of January 8, 1980 to the Florida For Kennedy Committee (FFKC) which was not actually received by the "FFKC" until January 19, 1980. The following responses are being made to the best of my knowledge and reflect the response of the "FFKC".

- 1) The correct mailing address of the "FFKC" is:
Florida For Kennedy Committee
c/o Mann & Safchik
255 Alhambra Circle Suite 412
Coral Gables, Florida 33134
- 2) The amended July 10, 1979 and October 10, 1979 Reports of Receipts And Expenditures are in the process of being amended by myself and the Assistant Treasurer of the "FFKC", Jeff Safchik. We shall forward these reports to your office immediately upon their completion.
- 3) All contributors (who gave in excess of \$100) to the "FFKC" were asked to comply with sections 2 U.S.C. 434 (b)(2), 11 C.F.R. 100.11 and 11 C.F.R. 100.12 in the form of our information request sheet (see exhibit "A"). We have sent this sheet to all contributors that have not furnished us with the information required in the above mentioned sections of the code.
- 4) The disbursement made to Sergio Bendixen for "Moving Expenses" represents an expense of the "FFKC" to get Mr. Bendixen to move to Florida and become the main consultant to the "FFKC" and coordinate the state activities for the "FFKC" and then move back

FLORIDA FOR KENNEDY COMMITTEE



Mike Thompson
January 25, 1980
Page 2

330403373835
to Washington, D.C. after the October 13, 1979 Florida Democratic Caucus. This "Moving Expense" was part of the consultant fee paid to Mr. Bendixen for his services rendered.

- 5) All amounts indicated as rent on the October 10, 1979 report represent office space paid to the lessor of the office. No individual acted as an agent on behalf of the committee to secure space and pay any applicable rents.
- 6) The contribution by the District Council of New York City United Brotherhood of Carpenters & Joiners of America, was made from a separated segregated fund for voluntary contributions and not out of its regular operating fund. This contribution is acceptable, as made, according to the code.

As I previously stated, we are in the process of amending the July 10, 1979 and October 10, 1979 reports, making the necessary changes as advised by the Federal Election Commission. If you have any questions, I can be contacted at my office (305) 532-6451 ext. 420, during working hours.

Sincerely,

Gary S. Burman, Treasurer
Florida For Kennedy Committee

cc: Jeff Safchik

FLORIDA FOR KENNEDY COMMITTEE



Exhibit "A"

Dear

On behalf of the Florida for Kennedy Committee, I would like to thank you very much for your recent contribution. As you know, there are many reporting requirements the committee must make to the Federal Election Commission. Please assist us in our reporting by completing the following information and returning it as soon as possible.

Name _____

Address _____

Present Occupation _____

Business Name and Address _____

Amount of Contribution _____

Please return this letter as soon as possible to:

Florida For Kennedy Committee
% Gary S. Burman
11202 S.W. 129 Place
Miami, Fl 33186

Very truly yours,

Gary S. Burman
Assistant Treasurer

FLORIDA FOR KENNEDY COMMITTEE

TELECON

ANALYST Mike Thompson
initiated call? _____

TELECON WITH: Gary Burman
initiated call? yes

(305) 532-6451 x420

Candidate/Committee: Florida for Kennedy Committee

DATE: 2-12-80

SUBJECT(S): Amendments for previous reports

Gary called to see if the amendments should be complete copies of the previous reports or if only the amended information had to be submitted. I told him that only the amended information is necessary. I suggested that the cover letter explain which reports are being amended.

He said that each will be amended separately, so the cover letter will state which report and what information is being amended, (for each amendment).

8304067683



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

13 February 1980

Mr. Gary Burman, Treasurer
Florida for Kennedy Committee (C99001091)
% Mann & Safchick (Suite 412)
255 Alhambra Circle
Coral Gables, Florida 33134

Dear Mr. Burman:

On January 8, 1980, (and re-mailed January 16, 1980), you were notified that a review of your July 10 and October 10, 1979 Reports of Receipts and Expenditures indicated that certain information required by the Federal Election Campaign Act and Regulations was missing or in error.

Your January 30, 1980 response has been reviewed and determined to be incomplete because you have not provided all of the requested information. For your response to be considered adequate, the following information is still required:

On Schedule B for Line 20a, your committee itemized expenditures to three individuals and listed the expenditures as "in-kind." Please amend your October 10 Report to identify the itemized contributions from these individuals as "in-kind" as required under 11 C.F.R. 104.3.

2 U.S.C. 434(b)(9) requires disclosure of the identification of each person to whom an expenditure has been made by or on behalf of the committee which is in excess of \$100, or in an amount less than \$100 if the total exceeds \$100 for the calendar year, together with the amount, date and particulars of each such expenditure. If persons to whom expenditures have been made are acting as agents on behalf of the committee, then the ultimate recipient(s) of those expenditures, along with the particulars of each such expenditure, must be disclosed in accordance with 2 U.S.C. 434(b)(9).

Accordingly, please amend your July 10 Report to provide the identification, (full name and mailing address), of recipients of expenditures made by the committee. Please amend your October 10 Report to provide the dates for all expenditures itemizable under 2 U.S.C. 434(b)(9).

In addition, while the terms "Consulting," "Travel" and "Advertising" may be acceptable under certain circumstances for descriptions of particulars of individual expenditures, a single expenditure for several purposes may be unclear. Also, particulars noted as "Consulting" and "Advertising" may be unclear as to the ultimate recipient(s) of expenditures. Please amend your October 10 Report to clarify the particulars of, and if applicable, the ultimate recipient(s), of the following expenditures. (A possible need to clarify the ultimate recipient(s) is denoted by an "*"):

Page Two.
Second Notice - Request for Additional Information:
July 10 and October 10, 1979 Reports.
Florida for Kennedy Committee (C99001091)

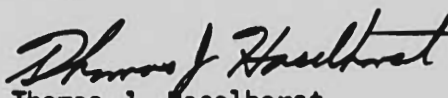
Holly Gewandter	\$ 401.75	"Reimbursed Expenses"
Camilla Bruce	\$ 164.64	" "
Katherine Odhay	\$ 365.00	" "
McPabitch Office	\$ 273.04	" "
Sergio Bendixen	\$12,206.44	"Consulting, Travel, Office Expense"
D. Kennedy	\$ 2,113.92	"Consulting, Travel, Office Expense"
*Jim Flack	\$ 7,714.04	" " " "
Mike Abrams	\$ 1,375.49	"Travel, Office Expense, Advertising"
Project Masters	\$ 3,809.86	"Consulting, Advertising*, Office Exp."
Zale Koff	\$ 1,150.00	"Advertising"
Cheryl Wohl	\$ 1,498.12	"Consulting, Office Expense"
Millenium Group	\$ 1,002.21	"Reimbursed Expense, Advertising"
L. Robinson	\$ 1,300.00	"Consulting, Travel"
*Roy Mathis	\$ 2,014.35	" "

Your October 10 Report includes a Schedule C for a loan made to the committee, but the committee has failed to provide information on debts and obligations owed by the committee for Line 13 of the Summary Page. (A loan is an obligation which is reportable and should be included with all obligations on Line 13). Please amend your October 10 Report accordingly.

Be advised that you must supply the Commission with the requested information within fifteen (15) days from the date of this notice. If no response is received, the Commission may choose to take legal action to insure compliance with the Act.

If you have any questions, contact Mike Thompson in our Reports Analysis Division on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,


Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

TELECON

ANALYST Mike Thompson
initiated call? yes

TELECON WITH: Mr. Gary Burman, Treasurer
initiated call?

Candidate/Committee: Florida for Kennedy Committee (C99001091)

DATE: 3-12-80

SUBJECT(s): Amendments to July 10 and October 10 Reports; Questions on YE, 1979

I called Mr. Burman to see how he was doing on the July 10 and October 10 amendments. (The committee has received an RFAI and a Second Notice on these reports).

He said that he was working on the amendments still and had completed a good portion of the work. Much of the material is in the process of being typed. However, he said that it may still be one to two weeks before any amendments may be submitted. He also said that much of the information is impossible to obtain.

He is very busy right now in his accounting work due to the time of year - tax time. He apologized for the delay but said that there was nothing he could do about it. He would simply continue to work on the response as time permits.

On the matter of the Year-End Report, I mentioned that I was mailing him an RFAI for questions we had on that report. I said that there were two possible corporate contributions we found and there were some other reporting discrepancies for 434 provisions. I outlined the problem with the possible corporate contributions and suggested that he contact the persons involved to verify the sources of the contributions. He will do so.

8304067336



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

12 March 1980

Mr. Gary Burman, Treasurer
Florida for Kennedy Committee (C99001091)
c/o Mr. Jeff Safchik
255 Alhambra Circle, Suite 412
Coral Gables, Florida 33134

Reference: 1979 Year-End Report (10/1/79 - 12/31/79)

Dear Mr. Burman:

This letter is prompted by the Commission's preliminary review of your 1979 Year-End Report. The review raised questions as to specific contributions and/or expenditures and to the reporting of certain information required by the Federal Election Campaign Act, (the Act). An itemization of these areas follows:

On Schedule A for Line 14a, your report discloses apparent contributions from corporations. You are advised that contributions from corporations are prohibited by 2 U.S.C. 441b unless made from a separate segregated fund established by the corporation for voluntary contributions from its employees. A copy of those portions of your report is attached so that a review of your records may be made.

The Commission recommends that if you have received prohibited contributions, you refund the full amounts to the donors. You should notify the Commission immediately of your determination in this matter. The returns of the contributions should be reported immediately by letter and should be disclosed as contribution refunds on Schedule B on your next report of receipts and expenditures.

If you find that the sources of these contributions are permissible under the Act, please submit a statement for the public record which would clarify the sources and the exact nature of the accounts upon which the checks were drawn. If the sources of the contributions have been disclosed incompletely or incorrectly, please amend your original report.

On Schedule A for Line 14a, your report discloses a contribution from McCandles and Barrett Partnership. 11 C.F.R. 110.1(e) requires that contributions from a partnership must be generally attributed to each partner in direct proportion to his or her share of the partnership profits. However, if the partners participating in the partnership contribution have agreed that the contribution should be attributed in another manner, the contribution should then be reported according to that agreement. Full name, mailing address, occupation and principal place of business as well as the amount of contribution of each partner must be provided if the amount per partner exceeds \$100. Please amend your report to properly attribute the partnership contribution to the individual partners.

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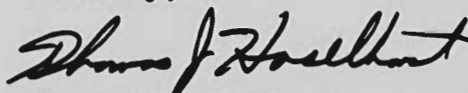
Page Two.
Request for Additional Information.
Florida for Kennedy Committee (C99001091)
1979 Year-End Report.

11 C.F.R. 100.12 defines "principal place of business" to be the "full name under which the business is conducted and the city and state in which the person is employed or conducts business." 2 U.S.C. 434(b)(2) requires disclosure of the occupation and principal place of business for each contributor who has contributed in excess of \$100. Please amend your Year-End Report to provide the principal place of business for each such contributor.

On the committee's October 10 Report, a loan from Mr. Peter Battenweiser was disclosed in the amount of \$2,000. The committee's Year-End Report does not include itemization for repayment of this loan and does not include Schedule C for debts and obligations. Please amend your report to provide Schedule C for this obligation owed by the committee and amend your Summary Page to reflect the total amount owed by the committee.

An amendment to your original report correcting the above matters, and your statement concerning the apparent corporate contributions, should be filed with the Commission within fifteen (15) days of the date of this notice. If you need assistance, please contact Mike Thompson on the toll-free number, (800) 424-9530. The local number is (202) 523-4048.

Sincerely,



Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

8304037330

DULE A
SED

Nov. 1978
at Election Commission
K Street, N.W.
Washington, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

Page 11 of 19 for
Line Number 14(a)

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Florida for Kennedy Committee

Full Name, Mailing Address and ZIP Code	Principal Place of Business	Date (month, day, year)	Amount of each Receipt this Period
Kenneth Hudson 70 Union St. Medford, Mass 02155	70 Union St. Medford, Mass 02155 Occupation Executive	10/9/79	\$500.00
Receipt for: ☐ Primary ☐ General ☒ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
Michael V. Forrestal 25 Central Park West New York, NY	53 Wall Street New York, NY 10005 Occupation Attorney	10/9/79	\$500.00
Receipt for: ☐ Primary ☐ General ☒ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
Howard Hiren 75 N. Federal Highway Dania, FL 33004	324 S.E. 10th St. Dania, FL 33024 Occupation Antique Dealer	10/9/79 10/12/79	\$1,000.00 \$1,000.00
Receipt for: ☐ Primary ☐ General ☒ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 2,000.00			
Bill Sinclair 7431 Arthur St. Hollywood, FL 33021	7431 Arthur St. Hollywood, FL 33021 Occupation Executive	10/9/79	\$1,000.00
Receipt for: ☐ Primary ☐ General ☒ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,000.00			
Henson, Hopkins & Shipley 402 West 7th St. Austin, TX 78701 <i>INK. 1-3-79</i>	402 West 7th St. Austin, Texas Occupation Attorneys	10/9/79	\$500.00
Receipt for: ☐ Primary ☐ General ☒ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00			
Anne F. Platt 3871 N.W. 100 Ave. Coral Springs, FL 33065	N/A Occupation Housewife	10/9/79	\$600.00
Receipt for: ☐ Primary ☐ General ☒ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 700.00			
Peter Dalton 1591 Lane Ave., S. Jacksonville, FL 32210	1591 Lane Ave., South Jacksonville, FL 32210 Occupation Attorney	10/9/79	\$300.00
Receipt for: ☐ Primary ☐ General ☒ Other ☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 300.00			
SUBTOTAL of receipts this page (optional)			\$ 5,400.00
TOTAL this period (last page this line number only)			\$

DULE A
SED

Nov. 1978
at Election Commission
K Street, N.W.
ngton, D.C. 20463

ITEMIZED RECEIPTS

(Contributions, Transfers, Contribution In-Kind,
Other Income, Loans, Refunds)

Supporting Lines 14a, 15a, 15b, 15c, 16a, 17a, and/or 18a
of FEC FORM 3

" Contribution in Kind "

Page 19 of 19 for
Line Number 14(a)

(Use Separate Schedules for
each numbered line)

Name of Candidate or Committee in Full

Florida for Kennedy Committee

Full Name, Mailing Address and ZIP Code

Ramon Flores
1230 16th Ct.
Largo, FL 33540

Principal Place of Business

Patriotic Krewe of
Largo, FL

Date (month,
day, year)
10/6/79

Amount of each Receipt
this Period
\$190.68

Receipt for

☐ Primary ☐ General ☒ Other

Occupation

Executive Director

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ **190.68**

Full Name, Mailing Address and ZIP Code

Automized Type Systems
400 Hialeah Drive
Hialeah, FL 33010

Principal Place of Business

Hialeah, FL

Date (month,
day, year)
10/9/79

Amount of each Receipt
this Period
\$185.36

Receipt for

☐ Primary ☐ General ☒ Other

Occupation

Type Setter

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ **185.36**

Full Name, Mailing Address and ZIP Code

Roy Mathis
1618 Keith St.
Tallahassee, FL 32304

Principal Place of Business

P.O. Box 512
Tallahassee, FL 32304

Date (month,
day, year)
10/13/79

Amount of each Receipt
this Period
\$949.60

Receipt for

☐ Primary ☐ General ☒ Other

Occupation

Political Consultant

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Full Name, Mailing Address and ZIP Code

Gary Burman
11202 S.W. 129th Place
Miami, FL 33186

Principal Place of Business

11202 S.W. 129th Place
Miami, FL 33186

Date (month,
day, year)
12/27/79

Amount of each Receipt
this Period
\$200.00

Receipt for

☐ Primary ☐ General ☒ Other

Occupation

Banker

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ **200.00**

Full Name, Mailing Address and ZIP Code

Irving Azott
8380 Milrose Avenue
Los Angeles, California 90069

Principal Place of Business

8380 Milrose Avenue
Los Angeles, California 90069

Date (month,
day, year)
10/6/79

Amount of each Receipt
this Period
\$1,000.00

Receipt for

☐ Primary ☐ General ☒ Other

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ **1,000.00**

Full Name, Mailing Address and ZIP Code

Mike Jones
19 Linden Street
Allstone, Massachusetts 02134

Principal Place of Business

19 Linden Street
Allstone, Mass. 02134

Date (month,
day, year)
10/6/79

Amount of each Receipt
this Period
\$416.00

Receipt for

☐ Primary ☐ General ☒ Other

Occupation

Student

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$ **416.00**

Full Name, Mailing Address and ZIP Code

Principal Place of Business

Occupation

☐ Check if Contributor is self-employed

Aggregate Year-To-Date ... \$

Date (month,
day, year)

Amount of each Receipt
this Period

SUBTOTAL of receipts this page (optional)

\$ 2,941.64

TOTAL this period (last page this line number only)

\$131,967.64



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1229

Date Filmed 1/28/83 Camera No. --- 2

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