FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1370

Date Filmed 7-23-82 Camera No. --- 2

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FEDERAL ELECTION COMMISSION

- SEE ATTACHMENT -

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

| | | | |
|---|---|---|---|
| ___ | (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 Marsha E. Carter

date June 24, 1982

FEC 9-21-77

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1.) Copy of Subpoena Duces Tecum to Collado - bank account # deleted

2.) General Counsel's Factual & Legal Analysis - pg. 2 - bank account #

3.) Copy of Subpoena Duces Tecum to Barcode Santender - bank account #

4.) Subpoena and Order to Kennedy for President - bank account #

5.) 1st General Counsel's Report - bank account # - Pg. 2

6.) Memo to Loughrey fron CNS (10/29/80)- RAD referral #80L-158

7.) Ltr. fr. WCO to Steele (12/2/80)- pg. 2 - bank account # and bank account #s and telephone #s from exhibits to attachments

8.) Letter to Gentner fr. Mulero (3/31/81) - bank account #

9.) Account # of letter to Gentner fr. Mulero and bank statements (4/14/81)

10.) KFP response to interrogatives (8/10/81) - bank account #
KFP bank statements & copies of contributor checks - bank account #
Subpoened interrogatives to KFP - bank account #

11.) Letter & attachments- WCO to CNS (12/2/80)- account & telephone #s

12.) Memo to Docket re: mail procedures (2/25/81)

13.) Memo to CNS from Commission Sec. (2/25/81)

14.) Memo to Comm. (12/18/81) - bank account # and proposed concil. agrmnt.
Letter to Gentner fr. WCO (3/9/82)
Letter to WCO fr. KAG re: conciliation
Memo to CNS fr. Commission Sec. (3/16/82) & (1/7/82)
Draft copy of Concil. Agreement sent to respondent
Attachment to Sawyer response to interrogatives - account #

15.) Deposition of Miquel Lausell - p. 30, bank account #
Bank account #s fr. exhibits 1,2,3,& 4

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 18, 1982

Gary W. Christian
Graham & James
1050 17th Street, N.W.
Washington, D.C. 20036

RE: MUR 1370

Dear Mr. Christian:

On March 17, 1982, the Commission accepted the conciliation agreement signed by you on behalf of the Kennedy for President Committee in settlement of the above referenced matter. Accordingly, the file in this matter will be closed upon receipt of the amended report referred to in paragraph VI of the conciliation agreement, and will become part of the public record within thirty days thereafter. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from being made public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please so advise us in writing.

Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,
Charles N. Steele

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

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SUITE 1200
1050 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20036

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Ms. Marsha Genter
Office of General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

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Graham & James
1050 17th Street, N.W.
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RE: MUR 1370

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Enclosed you will find a fully executed copy of the final conciliation agreement for your files.

Sincerely,
Charles N. Steele

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

3/17/82

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
) MUR 1370
Kennedy for President Committee )

CONCILIATION AGREEMENT

This matter was initiated by the Federal Election Commission (hereinafter "Commission") pursuant to a letter received from the Kennedy for President Committee ('Respondent") that informed the Commission of certain irregularities it had discovered in the handling and reporting of funds by its authorized committee, Kennedy for President Puerto Rico. Additional information was obtained pursuant to an investigation undertaken by the Commission in the normal course of carrying out its supervisory responsibilities. Reason to believe has been found that due to the actions of its authorized committee the Respondent violated the following statutory and regulatory provisions:

2 U.S.C. §§ 433(b)(6) and 433(c), and 11 C.F.R.§§ 102.2(a)(1)(vi), 102.2(a)(2), and 103.1 by failing to timely register as a depository bank account number 008-030511, opened at the Banco de Santander on January 18, 1980;

2 U.S.C. § 434(b)(A) and 11 C.F.R. § 104.3(a)(3)(i)(B) for failing to timely report the receipts that comprised deposits of February 6, February 28, March 19, April 11, and June 13, 1980 into the KFP Banco de Santander account;

2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4)(i) for failing to timely disclose the identification of individuals whose

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contributions of $200 or more comprised a portion of the April 11, 1980 KFP deposit into the Banco de Santander account;

2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a) by failing to deposit $99,000 in cash received from a KFP radio marathon into an account at a registered Committee depository;

2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) by making expenditures of $88,000 and $11,000 by means other than a check drawn on an account at a Committee depository; and

2 U.S.C. §§ 434(b)(4)(A) and 434(b)(5)(A), and 11 C.F.R. §§ 104.3(b)(2)(i) and 104.3(b)(4)(i) by failing to timely report March 1980 KFP expenditures of $88,000 and $11,000 to Lopito, Ileana and Howie, Inc., and DHS Films, Inc., respectively.

NOW, THEREFORE, the Commission and Respondent, having duly entered into conciliation pursuant to 2 U.S.C. § 437g(a)(4)(A)(i) do hereby agree as follows:

I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding.

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

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

IV. The pertinent facts in this matter are as follows:

1. Respondent is the principal campaign committee authorized by Senator Edward M. Kennedy to receive contributions and make expenditures in connection with Senator Kennedy's candidacy for the Democratic nomination for the Office of President in 1980. Kennedy for President/Puerto Rico (hereinafter "KFP/PR")

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is the local affiliate of Respondent authorized to receive contributions and make expenditures in connection with Senator Kennedy's 1980 primary campaign in Puerto Rico.

2. Respondent asserts, and the Commission found no evidence to the contrary, that the actions of KFP/PR that are the basis of this enforcement matter were taken without the knowledge or approval of the Kennedy for President Committee.

3. Citizens of the Commonwealth of Puerto Rico do not participate in the U.S. presidential election. Nor, until the 1979-1980 presidential campaign, had citizens of the Commonwealth participated in presidential primaries. In 1980, for the first time, presidential preference primaries were held in Puerto Rico by the major parties.

4. The Commission has not found reason to believe that Respondent's violations of the Act were knowing or willful.

5. On January 18, 1980, Miguel Lausell, campaign director of KFP/PR, opened a checking account ( ) in the name of KFP/PR at Banco de Santander, San Juan, Puerto Rico. This account at Banco de Santander was not disclosed by the Respondent as one of its depositories until March 23, 1981, when an amended statement of organization was filed with the Commission.

6. Deposits of Respondent (KFP/PR) funds were made into Banco de Santander account by Miguel Lausell and his agents, and included, inter alia, a deposit of $4,000 on or about February 6, 1980, a deposit of $2,000 on or about February 28,

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1980, a deposit of $20 on or about March 19, 1980, a deposit of $6,325 on April 11, 1980, and a deposit of $365 on June 13, 1980. The deposit of $6,325 was comprised of funds which included contributions to the Respondent of $200 or more. The deposit of $365 was comprised of funds which included two checks to the Respondent, in the amounts of $100 and $130, respectively.

7. The Respondent did not maintain an accounting of the contributions which comprised the aforementioned deposits of $4,000, $2,000, $20, and $365. Respondent disclosed the identity of the individuals whose contributions of $200 or more comprised a portion of the aforementioned April 11, 1980 deposit of $6,325, by filing an amended report with the Commission on December 12, 1980. The funds comprising the deposits of $4,000, $2,000, $20 and $365 were also disclosed on the December 12, 1980 amended report of Respondent as unitemized receipts.

8. On or about March 8, 1980, KFP/PR held a radio-marathon to raise funds for Senator Kennedy's campaign with respect to the March 16, 1980 Democratic presidential primary election in Puerto Rico. Approximately $99,000 in cash was received from this fund-raising event. Miguel A. Rivera, a KFP/PR volunteer who organized the marathon, took $88,000 of the money raised, and on or about March 9 to 16, 1980, paid this cash to Lopito, Ileana and Howie, Inc., of Puerto Rico, as advance payment for media time for the Kennedy campaign in Puerto Rico, and for the firm's services in obtaining the media time bought by Respondent. The remaining

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$11,000 raised from the marathon was converted into four cashier's checks from the Banco Popular de Puerto Rico on March 19, 1980, and made to the order of David Sawyer. Mr. Sawyer received these checks totaling $11,000 on March 25, 1980, and immediately endorsed them to the order of his firm, DHS Films, Inc., as the money was intended as payment for production services arranged by Sawyer on behalf of DHS Films, Inc., and provided by the firm on February 27, 1980 to Respondent in connection with the Puerto Rican primary campaign.

9. Respondent disclosed the March 1980, $88,000 payment to Lopito, Ileana and Howie, Inc., in the amended report filed by Respondent with the Commission on December 12, 1980. This December 12, 1980 amended report also disclosed for the first time $9,000 of the March 25, 1980 $11,000 payment to DHS Films, Inc. The remaining $2,000 of the March 25, 1980 payment to DHS Films, Inc. was not disclosed in any amended report filed by Respondent.

10. The Kennedy for President Committee conducted its own investigation upon first learning of these matters in May of 1980. On December 4, 1980, KFP wrote to the Commission advising it of the information KFP had discovered and the respondent's efforts to correct these violations. Respondent has at all times cooperated fully with the Commission's investigation of this matter and has at all times been ready to voluntarily comply with the Act with respect to the matters discussed herein.

V. 1. Respondent failed to file an amended statement of organization disclosing its depository at Banco de Santander, San

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Juan, Puerto Rico within ten days of opening account #008-030511 at that depository, in violation of 2 U.S.C. §§ 433(b)(6) and 433(c) and 11 C.F.R. §§ 102.2(a)(1)(vi), 102.2(a)(2), and 103.1.

2. Respondent failed to report the unitemized receipts which comprised its deposits of $4,000, $2,000, $20, and $365 on February 6, February 28, March 19, and June 13, 1980, respectively, into Respondent account # at Banco de Santander, Puerto Rico, in the first monthly report following the thirty-day period in which the funds were received, in violation of 2 U.S.C. § 434 (b)(2)(A) and 11 C.F.R. § 104.3(a)(i)(B). Respondent also failed to timely disclose the identity of those individuals whose contributions of $200 or more comprised a portion of the $6,325 deposit on April 11, 1980 into Respondent account # at Banco de Santander, Puerto Rico, in violation of 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4)(i).

3. Respondent failed to keep an accounting of the contributions which comprised the deposits of $4,000, $2,000, and $20, made on February 6, February 28, and March 19, 1980, respectively, into Respondent account # at Banco de Santander, in violation of 2 U.S.C. § 432(c)(1) and 11 C.F.R. § 102.9(a). Respondent also failed to keep an accounting, including the contributor name and address, of a contribution of $100 and one of $130, which comprised a portion of the $365 in receipts deposited into Respondent account ., Banco de Santander, on June 13, 1980, in violation of 2 U.S.C. § 432(c)(2) and 11 C.F.R. § 102.9(a)(1).

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4. Respondent failed to deposit the $99,000 in cash receipts obtained on or about March 8, 1980, as a result of the radio marathon it held in Puerto Rico, into a registered depository of Respondent, in violation of 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a).

5. Respondent made a disbursement of $88,000 to Lopito, Ileana and Howie, Inc., and a disbursement of $11,000 to DHS Films, Inc, by means other than a check drawn on a registered depository of Respondent, in violation of 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a).

6. Respondent failed to timely disclose its March 1980 expenditure of $88,000 to Lopito, Ileana and Howie, Inc., and its March 19, 1980 expenditure of $11,000 to DHS Films, Inc., in the first report filed by Respondent following the thirty-day period in which the expenditures were made, thereby violating 2 U.S.C. §§ 434(b)(4)(A) and 434(b)(5)(A), and 11 C.F.R. §§ 104.3(b)(2)(i) and 104.3(b)(4)(i).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of four-thousand dollars ($4,000), pursuant to 2 U.S.C. § 437g(a)(5)(A). Respondent will also file an amended report disclosing, in conformity with 2 U.S.C. § 434(b)(5)(A), the $2,000 payment made by the Committee to DHS Films, Inc., on March 19, 1980.

VII. Respondent agrees that it shall not undertake any activity which is in violation of the Federal Election Campaign Act of 1971, as amended, 2 U.S.C. §§ 431-455.

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VIII. The Commission, on request of anyone filing a complaint under 2 U.S.C. § 437g(a)(1) concerning the matters at issue herein or on its own motion, may review compliance with this agreement. If the Commission believes that this agreement or any requirement thereof has been violated, it may institute a civil action for relief in the United States District Court for the District of Columbia.

IX. This agreement shall become effective as of the date that all parties hereto have executed same and the Commission has approved the entire agreement.

X. Respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

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March 17, 1982
Date

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

March 9, 1982
Date

Kennedy for President Committee

BY: Gary W. Christian

ITS: Attorney

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
) MUR 1370
Kennedy for President Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 17, 1982, the Commission decided by a vote of 5-0 to take the following actions in MUR 1370:

1. Approve the conciliation agreement as submitted with the March 12, 1982 Memorandum to the Commission.

2. Close the File in this matter.

3. Send the letter as attached to the Memorandum to the Commission dated March 12, 1982.

Commissioners Elliott, Harris, McDonald, McGarry and Reiche voted affirmatively; Commissioner Aikens did not cast a vote in this matter.

Attest:

3/17/82
Date

Marjorie W. Emmons
Secretary of the Commission

Received in Office of Commission Secretary: 3-12-82, 11:59
Circulated on 48 hour tally basis: 3-15-82, 11:00

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
)
Kennedy for President Committee ) MUR 1370

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on January 12, 1982, do hereby certify that the Commission took the following actions in MUR 1370:

1. Failed on a vote of 3-3 to pass a motion to -

   a) Authorize the Office of General Counsel to enter into informal conciliation discussions with counsel for the Kennedy for President Committee;

   b) Approve the conciliation agreement attached to the General Counsel's December 18, 1981 report, subject to increasing the proposed civil penalty to $10,000 as a starting point for conciliation.

   Commissioners Aikens, Elliott, and Reiche voted affirmatively for the motion; Commissioners Harris, McGarry, and McDonald dissented.

2. Decided by a vote of 4-2 to -

   a) Authorize the Office of General Counsel to enter into informal conciliation discussions with counsel for the Kennedy for President Committee;

   b) Approve the conciliation agreement attached to the General Counsel's December 18, 1981 report.

   Commissioners Aikens, Harris, McGarry, and McDonald voted affirmatively for the decision; Commissioners Elliott and Reiche dissented.

Attest:

1-13-82
Date

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

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

81 DEC 18 P3:30

December 18, 1981

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: Proposed Informal Conciliation in MUR 1370

A. Background

This matter under review arose upon receipt of a letter from counsel for the Kennedy for President Committee (hereinafter "Committee" or "KFP") concerning the receipt of cash by KFP's Puerto Rican affiliate ("Kennedy for President/Puerto Rico" or "KFP/PR") as a result of a fundraising activity held approximately at the time of the Puerto Rican Democratic presidential primary election,1/ and concerning an apparently unregistered bank account maintained by KFP/PR. Upon review and consideration of this letter from KFP and other reports filed by KFP, the Commission on February 23, 1981, found there was reason to believe that the Committee violated 2 U.S.C. §§ 433(b)(6) and 433(c), and 11 C.F.R. §§ 103.1, 102.2(a)(1)(vi) and (2) by failing to timely register a Committee depository; 2 U.S.C. § 434(b)(2)(A) and (b)(3)(A), and 11 C.F.R. §§ 104.3 (a)(3)(i) and (a)(4)(i) by failing to timely report the receipt of contributions and the identity of certain contributors; 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a) by failing to timely deposit receipts in a registered campaign depository; 2 U.S.C. §§ 434(b)(4)(A) and (b)(5)(A), and 11 C.F.R. §§ 104.3(b)(2)(i) and (b)(4)(i) by failing to timely report certain expenditures made; and 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) by failing to make certain expenditures by check drawn on a registered campaign depository.

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1/ The primary election for the Democratic nominees for President and Vice President was held in Puerto Rico on March 16, 1980, and was the first such Democratic primary in Puerto Rico's history.

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Pursuant to 2 U.S.C. § 437g(a)(2), the Committee was notified of the Commission's preliminary determination. An investigation of the matter was subsequently undertaken by the Commission's Office of General Counsel. This investigation included a subpoena of bank documents with respect to the KFP/PR bank account, two sets of interrogatories to KFP and a subpoena for documents, interrogatories and document requests to two KFP/PR vendors, each of whom received a portion of the cash receipts in question, and the depositions of two individuals associated with KFP/PR, as well as a representative of one of the aforementioned vendors. The investigatory stage in MUR 1370 is completed and the General Counsel's Office is prepared to go forward with recommendations for further action by the Commission. However, on December 8, 1981, a letter was received from counsel for the Committee requesting that informal conciliation discussions take place at this juncture in the proceedings in an attempt to settle this matter. See Attachment II. The Office of General Counsel recommends that the Commission authorize this Office to undertake informal conciliation discussions with the Committee at this time.

B. Investigative Information Obtained

Based on the deposition testimony and the responses and documents received by the Commission, along with reports filed with the Commission, the following facts have been found by the Office of General Counsel.

KFP/PR began operations as a committee authorized to carry out Senator Kennedy's primary campaign in Puerto Rico in early November of 1979. Dr. Victor Gutierrez was named "President" of KFP/PR, with Miguel Lausell as the committee's "Campaign Director", responsible for the political operations and organization of the committee.

As an authorized committee, KFP/PR had the authority to receive contributions and make expenditures on behalf of the Senator's presidential campaign. Accordingly, as was KFP's professed practice with all of its field offices, instruction "packets" which included specific instructions as to the collection, processing, and reporting of contributions were provided to KFP/PR.[2/] In addition, according to KFP and testimony

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2/ KFP, in its August 10, 1981 response to Commission interrogatories, stated that the above-cited instructions were sent to KFP/PR. Miguel Lausell, in his deposition, acknowledged receiving some instructions from KFP; however, in response to a document request to KFP and KFP/PR, no such materials were produced.

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of the KFP/PR campaign director, the Committee maintained a procedure whereby its Puerto Rican office was to send all funds received to KFP headquarters in Washington, which would, upon request, dispense funds for expenditures to the local office on an as-needed basis.

KFP/PR did not strictly adhere to the above procedures. Instead, and apparently as a result of some frustration with the mechanics of the Committee procedure, Mr. Lausell opened a bank account in the name of KFP/PR at Banco de Santander in San Juan, Puerto Rico. This account (#008-030511) was opened on January 18, 1980, without the consent or prior knowledge of those at KFP national headquarters.3/ In addition, the following deposits comprised of contribution receipts were made directly into the account on the dates noted, without having first gone through the Committee headquarters:

| DATE | AMOUNT |
|---|---|
| February 6, 1980[4]/ | $4,000 |
| February 28, 1980 | $2,000 |
| March 19, 1980 | $20 |
| April 11, 1980 | $6,325 |
| June 13, 1980 | $365 |

KFP/PR also departed from Committee procedures in holding a radio "marathon" for the Senator's Puerto Rican campaign. As explained in testimony of Migual A. Rivera, a KFP/PR volunteer experienced in organizing such political marathons and who was chosen by Dr. Gutierrez and Mr.Lausell to conduct the one on

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3/ KFP asserts that it was not informed by KFP/PR officials for some months of the existence of the Puerto Rican account. Mr. Lausell testified confirming that no such express information was given, but maintained that the Committee should have made an inference to that effect inasmuch as money for expenditures incurred was dispensed to KFP/PR from KFP, and it could be assumed that the money would be held in some sort of bank account.

4/ Although, KFP originally stated in response to Commission interrogatories that it did not know the exact dates for the first three deposits listed above, the dates provided were those subsequently used by the Committee in amended reports filed, and copies of bank statements provided by Banco de Santander show these deposits did occur on or about the dates listed.

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behalf of KFP/PR, a radio marathon is a fund-raising event similar to a charitable telethon. Prior to the marathon, an overall financial goal is set. In addition, quotas are set for sub-groups in different areas (usually set up on a geographical basis).5/ The "leaders" of the sub-groups are responsible for seeing that the quotas for their geographical areas are are met, and usually begin work to raise the money upon learning of the quota. Collections are most commonly made by individuals on street corners with tin cans, much like the method used by the Salvation Army and other charitable organizations at Christmas time. In those less urban and more residential areas, collections are accomplished by distributing envelopes on a house-to-house basis, to be picked up two or three days later. Thus, the emphasis of this type of fund-raising event is on numerous, small cash and coin contributions6/

The money collected at such a marathon is not immediately transferred to the receipient as it comes into the local subgroups. Rather, sub-unit leaders wait until the date of the radio broadcast to announce the amount their unit has collected and to deliver it to the recipient at the location where the broadcast is being transmitted, very often a parking lot, a school auditorium, or other large public meeting place. This is apparently done to build the excitement of the event as well as the efficacy of the radio broadcast as a campaign tool in and of itself. Leaders are referred to designated areas, where marathon organizers count the money and place it away for safekeeping, to be deposited or otherwise disposed of after a final accounting is made following the broadcast.

This was generally the procedure followed with the KFP/PR radio marathon, which was held on or about March 8, 1980. However, as KFP/PR had no exisiting subordinate organizational structure,

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5/ Mr. Rivera explained that, in his experience, the marathon is most often used by political groups with a permanently established subordinate organizational structure already in place.

6/ Indeed, Mr. Rivera explained that this is a sought after and expected public relations selling point of the marathon as a political fund-raising event.

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see n.5, supra, it was necessary for the committee to designate its own geographical groupings and local volunteer leaders. Moreover, because the financial goal set for the KFP/PR marathon was comparatively small - $100,000 - the broadcast was transmitted from the KFP/PR San Juan office, where a financial committee designated and supervised by Mr. Rivera took custody of, counted, and "bagged" the money received.

According to testimony of Mr. Rivera and Mr. Lausell, approximately $99,000 in cash and coin was received by KFP/PR as a result of the March 8, 1980 radio marathon.7/ Mr. Rivera further testified that the money was kept at KFP/PR headquarters, recounted one to two days later, and that he was directed by Mr. Lausell to set aside $11,000 of the money for a payment to DHS Films, Inc., a firm which had rendered media production services for KFP/PR. The rest of the money - approximately $88,000 - was to be taken to the firm of Lopito, Ileana and Howie, Inc. ("Lopito"), which Rivera did do sometime during the week of March 9, 1980.

Julio Hector Morales, Lopito's assistant comptroller in charge of billing and receiving payments, has confirmed in his deposition testimony that Rivera brought a total of $88,000 to Lopito for advance payment of services8/ sometime during the week of March 9-17, 1980.9/

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7/ Mr. Rivera testified that some checks made out to cash may also have formed a portion of this $99,000. Mr. Rivera also stated that he did not recall seeing any cash denominations among those funds larger than a twenty dollar bill.

8/ Lopito was the media time buyer for KFP/PR. By oral agreement, KFP/PR was required to make payment to Lopito for any media time buys in advance.

9/ Mr. Morales remembers the payments being made over a few days by Rivera and others. Rivera's account of this aspect is not clear, though he seemed to indicate that he did make more than one trip to Lopito, as he stated the "first" payment he made was for $66,000. Lopito has produced deposit slips for the $66,000 for the dates of March 12 through 13, 1981. There seems to be no doubt by anyone, however, of the approximate time frame of these events and that a total of about $88,000 in cash was delivered. Indeed, a sworn affidavit of Morales dated April 17, 1980 confirms his receipt on behalf of Lopito of the $88,000 cash payment from KFP/PR.

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The remaining $11,000 was converted into four cashier's checks from the Banco Popular of Puerto Rico on March 19, 1980, and made to the order of David Sawyer. Mr. Sawyer received these checks by mail, on March 25, 1980, and immediately endorsed them over to his production firm, DHS Films, Inc., as he knew they were intended as payment by KFP/PR for production services provided to the committee by DHS Films, Inc. on February 27, 1980.

KFP national headquarters personnel were not aware of the marathon, the cash receipts, or the cash payments at the time they occurred. KFP staff did become concerned when, in preparation for the filing of the April 1980 monthly report, they received no information concerning expenditures by KFP/PR. KFP sent a staff member to Puerto Rico in May, 1980, at which time the Committee learned of the aforementioned actions. In June of 1980, KFP sought to freeze activity with respect to the unregistered KFP/PR account at Banco de Santander.

On December 3, 1980, KFP sent a letter to the Commission, voluntarily informing the Commission of these possibly unlawful activities of KFP/PR. On December 12, 1980, KFP filed a comprehensive amended report, wherein it reported for the first time the March expenditures to DHS Films, Inc. and Lopito.10/ This comprehensive amendment also itemized the contributions of $200 or more received by KFP/PR that comprised the April 11, 1980 deposit into the unregistered Committee account, and reported as unitemized contributions/receipts the other four deposits into the KFP/PR unregistered account that previously had not been reported. On March 23, 1981, KFP filed an amendment reporting the Puerto Rican depository opened on January 18, 1980.

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III. Apparent Violations of the Federal Election Campaign Act

A. Activity Involving The Unregistered Depository

As the uncontroverted factual evidence demonstrates, KFP, through its authorized committee KFP/PR, opened a

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10/ This report omitted one of the payments - for $2000 - to DHS Films, Inc. Although KFP, in its March 23, 1981 response to Commission interrogatories, indicated its intention to file this information in an amended report, such disclosure could not be located in KFP reports filed with the Commission as of November 12, 1981.

checking account at Banco de Santander, San Juan on January 18, 1980. Deposits of KFP/PR receipts into, and expenditures of KFP/PR funds from this account were made. Yet, the Committee did not file an amended report listing this depository until March 23, 1981, or some fourteen months after the account was opened. 2 U.S.C. § 433(b)(6) and 11 C.F.R. §§ 103.1 and 102.2(a)(1)(vi) require committees to include in a statement of organization, a listing of all depositories. 2 U.S.C. § 433(c) and 11 C.F.R. § 102.2(a)(2) further require that if a committee obtains a depository after filing its statement of organization, that depository shall be reported on an amended statement within ten days. As KFP obviously failed to timely comply with these provisions, the General Counsel would, if this matter were not conciliated, recommend that the Commission find probable cause to believe KFP violated 2 U.S.C. §§ 433(b)(6) and 433(c), and 11 C.F.R. §§ 102.2 (a)(1)(vi), (a)(2), and 103.1. Accordingly, the attached proposed conciliation agreement contains an admission of that violation.

A review of the records of the KFP/PR checking account submitted by the Banco de Santander confirms that the five deposits of KFP/PR receipts into the account from February to June 1980, as listed in the above factual analysis, did occur, although the funds comprising those deposits were not disclosed as Committee receipts until the filing of the December 12, 1980, KFP comprehensive amendment. Inasmuch as 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i)(B) require the reporting of such receipts in the monthly report for the thirty-day period in which the funds were received, and as KFP did not make such disclosure until some six to ten months after the funds were received by KFP/PR, the proposed conciliation agreement contains a clause admitting these statutory and regulatory provisions were violated by KFP.

In addition, records submitted by KFP and Banco de Santander demonstrate that the April 11, 1980 KFP/PR deposit in the amount of $6,325 consisted of several contributions of $200 or more. Again, although 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4)(i) require the disclosure of the identity of the donors of such contributions in the next report filed by the Committee after receipt of the funds in question, KFP did not file a report containing this required identification until December 12, 1980, a minimum of eight months after receipt of these contributions by KFP/PR. Therefore, the conciliation agreement by the General Counsel contains a paragraph stating that KFP violated 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4)(i).

6204033297 7

The bank records received also indicate that the KFP/PR $365 deposit on June 13, 1980, included a check for $130 and one for $100. 2 U.S.C. § 432(c)(2) and 11 C.F.R. § 102.9(a)(1) require that committees keep an accounting of the contributor name and address, and date of receipt for each contribution received in excess of $50. However, in response to interrogatories and document requests to KFP, no such records could be located or produced with respect to these two contributions that formed part of the June 13, 1980, deposit. In fact, although requested in Commission subpoenas to KFP, no Committee (or KFP/PR) records or information of any kind were produced concerning the receipts that comprised the KFP/PR deposits of February 6, February 28, and March 19, 1980 into the Banco de Santander account.11/ Yet 2 U.S.C. § 432(c)(1) and 11 C.F.R. § 102.9(a) require that at least some account of all contributions received by a committee be kept by the committee treasurer or the treasurer's agent. Accordingly, the attached proposed conciliation agreement seeks an admission that the Committee violated 2 U.S.C. § 432(c)(1) and (2), and 11 C.F.R. § 102.9(a) and (a)(1).

B. Apparent Violations Arising from the Radio Marathon

As is clear from the factual evidence presented, KFP/PR received cash contributions from its radio marathon totalling $99,000, and these cash receipts were never deposited into a registered (or unregistered) committee bank account. Rather, these receipts were paid directly to KFP/PR vendors, in the form of cash and cashier's checks.12/ Thus, as 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a) require that all receipts received by a committee be deposited into an account at a registered committee depository, and as these provisions clearly were not complied with, the proposed conciliation agreement states that these statutory and regulatory mandates were violated by KFP.

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11/ During the deposition of Migual Lausell, KFP/PR campaign director, Mr. Lausell was asked if he was aware of the Commission's subpoena duces tecum to KFP (and KFP/PR), and if so, if he had turned over all relevant documents requested. Mr. Lausell answered affirmatively to both questions.

12/ Banco Popular de Puerto Rico, the issuer of the four cashier's checks to David Sawyer, was not a registred Committee depository.

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2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) also require that all committee disbursements (except those for petty cash in amounts of $100 or less) be made by check drawn on a registered committee depository. As KFP/PR made its expenditure of $88,000 to Lopito in cash, and its $11,000 expenditure to DHS, Films, Inc., by cashier's checks from a bank that was not a KFP registered depository, the General Counsel has included a paragraph in the attached conciliation agreement stating that 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) were violated by the Committee for the aforementioned reason, as well.

Moreover, although the expenditures to Lopito and DHS Films, Inc. were made in March of 1980, giving rise to an obligation to disclose those expenditures and their particulars in the following KFP monthly report, see 2 U.S.C. §§ 434(b)(4)(A) and (b)(5)(A) and 11 C.F.R. §§ 104.3(b)(2)(i) and (b)(4)(i), the expenditures were not reported until December 12, 1980, eight months after they were made. Therefore, the proposed conciliation agreement includes a statement that KFP violated 2 U.S.C. §§ 434(b)(4)(A) and (b)(5)(A) and 11 C.F.R. §§ 104.3(b)(2)(i) and (b)(4)(i).

Finally, in the preliminary legal analysis contained in this office's report recommending the Commission find reason to believe the Federal Election Campaign Act was violated and initiating this matter, the General Counsel noted the possibility that because the receipt of such a large amount of cash was involved, evidence might be found which would indicate that some of the cash contributions received were in excess of the lawful limit of $100. See 2 U.S.C. § 441g. However, no such evidence was found in the voluminous documents and testimonial evidence obtained in this matter. Indeed, as Mr. Rivera indicated, the very nature of the radio marathon fund-raising mechanism practically forces small contributions, and in fact the high volume of very small contributions is one of the desired public relations benefits of the marathon method of raising money.13/ In light of this evidence, the General Counsel believes that the Commission may settle this matter without reference to any possible violation of 2 U.S.C. § 441g.

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13/ In addition, Rivera and Morales both testified that in counting and recounting the cash received no denomination in excess of a twenty-dollar bill was seen.

0204032979

**Recommendation**

1. Authorize the Office of General Counsel to enter into informal conciliation discussions with counsel for the Kennedy for President Committee.

2. Approve the attached conciliation agreement.

Attachments

I. Proposed Conciliation Agreement
II. Letter from KFP counsel

6204033329800

Gentner

WILLIAM C. OLDAKER
ATTORNEY AT LAW
1000 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20036

TELEPHONE
202 296-0505

CABLE ADDRESS: "CHALORAY"
TLX-[illegible]

December 8, 1981

FEC 8 P3:19

Ms. Marsha Gentner
Office of General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

RE: MUR 1370

Dear Ms. Gentner:

I understand that you are in the process of preparing the probable cause brief in MUR 1370. The Kennedy for President Committee would be interested in exploring the possibility of conciliating this matter prior to a finding of probable cause. Please advise me whether this would be possible and what terms the Commission would want.

I would be happy to meet with you to discuss this at your convenience.

Sincerely,

William C. Oldaker

WCO:jv

0204033329811

Attachment II

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 18, 1982

William C. Oldaker, Esquire
Graham and James
1050 17th Street, N.W.
12th Floor
Washington, D.C. 20036

RE: MUR 1370

Dear Mr. Oldaker:

Pursuant to your request of December 8, 1981, the Federal Election Commission has authorized the General Counsel's Office to undertake informal conciliation efforts with you concerning respondent Kennedy for President Committee in the above-referenced action. Accordingly, enclosed please find a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If your client agrees with the provisions of the enclosed agreement, please sign and return it, along with the civil penalty, to the Commission within ten (10) days. I will then recommend that the Commission approve the agreement. The check for the civil penalty should be made payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please promptly contact Marsha Gentner, at 523-4175. I must point out, however, that if no significant steps toward reaching an agreement in this matter have been taken within thirty (30) days of your your receipt of this letter, that this Office will proceed to the probable cause briefing stage of this compliance action, as set forth in 2 U.S.C. § 437g(a)(3).

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

2040329822

WILLIAM C. OLDAKER
ATTORNEY AT LAW
1000 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20036

TELEPHONE
202 [illegible]-0808

CABLE ADDRESS: "OMALOBAY"
TLO-[illegible]-8287

December 8, 1981

RECEIVED
FEDERAL ELECTION COMMISSION
GENERAL COUNSEL
'81 DEC 8 P3:10

Ms. Marsha Gentner
Office of General Counsel
Federal Election Commission
1325 "K" Street, N.W.
Washington, D.C. 20463

RE: MUR 1370

Dear Ms. Gentner:

I understand that you are in the process of preparing the probable cause brief in MUR 1370. The Kennedy for President Committee would be interested in exploring the possibility of conciliating this matter prior to a finding of probable cause. Please advise me whether this would be possible and what terms the Commission would want.

I would be happy to meet with you to discuss this at your convenience.

Sincerely,

William C. Oldaker

WCO:jv

6204033329835

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

81 OCT 26 P4:03

October 19, 1981

Mr. John Warren McGarry
Chairman
Federal Election Commission
United States of America

RE: MUR 1370

ANSWERS TO WRITTEN QUESTIONS

1. Jorge L. de Jesús

2. Agency demanded payment in advance for production and media expenses, in Puerto Rico. Broadcasters and others suppliers requires payments in advance for political advertising.

   a) Oral Agreement

3. a) Julio H. Morales
   b) Different Dates
   c) Payment demanded in advance
   d) Payment demanded in advance
   e) Payments received in checks and cash

4. Yes

   a) Different days
   b) Around $80,000.00
   c) Miguel Rivera and others
   d) Julio Morales
   e) None
   f) None
   g) Deposited on Bank
   h) See copies of deposits slips attached
   i) For services which were to be rendered
   j) None

LOPITO
ILEANA &
HOWE, INC.
Concordia 716
Miramar
Puerto Rico
Tel. 724-7260

0204033298 4

5. Julio Héctor Morales is our Assistant Comptroller in charge of billing, receiving payments

6. Yes, requested by KFP/P.R. committee.

7. a) None
   b) Copies are attached
   c) See copies of invoices for services rendered.

6204032985

Jorge L. de Jesús
Executive Vice President

CHASE — Depósito en The Chase Manhattan Bank, N.A.

Pdo 23 — Sucursal 3/12/80 — Fecha

Depósito para la cuenta de 1033

LOPITO, ILEANA & HOWIE, INC.

3,500.00

MAR 12 '80

SOLAMENTE PARA USO DEL BANCO

Los Depósitos Se Reciben Bajo Las Condiciones Al Dorso

| | | | | | | |
|---|---|---|---|---|---|---|
| Check | | | 0 | | | |
| Less Dep. | | | 3 | | | |
| Cash Ret'd | | | | | | |

CHECKING DEPOSIT
CUSTOMER'S COPY

---

CHASE — Depósito en The Chase Manhattan Bank, N.A.

Pdo 23 — Sucursal 3-12-80 — Fecha

Depósito para la cuenta de 1033

LOPITO, ILEANA & HOWIE, INC.

Efectivo — Dolares 1000 —

Cheques Detallese 1 2

---

CHASE — Depósito en The Chase Manhattan Bank, N.A.

CHASE Pdo 23 — Sucursal 3-12-80 — Fecha

Depósito para la cuenta de 1033

LOPITO, ILEANA & HOWIE, INC.

Efectivo — Dolares 25.00 —

Cheques Detallese 1 2

---

CHASE — Depósito en The Chase Manhattan Bank, N.A.

Pdo 23, — Sucursal 3/12/80 — Fecha

Depósito para la cuenta de 1033

LOPITO, ILEANA & HOWIE, INC.

Efectivo — Dolares 2000 —

Cheques Detallese 1 2

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CHASE — Depósito en The Chase Manhattan Bank, N.A.

Pdo. 23 — Sucursal 3/13/80 — Fecha

Depósito para la cuenta de 1033

LOPITO, ILEANA & HOWIE, INC.

Efectivo — Dolares 5625 —

Cheques Detallese 1 2

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CHASE — Depósito en The Chase Manhattan Bank, N.A.

Pdo. 23 — Sucursal 3/13/80 — Fecha

Depósito para la cuenta de 1033

LOPITO, ILEANA & HOWIE, INC.

Efectivo — Dolares 100000

Cheques Detallese 1 2 3 4 5 6

SOLAMENTE PARA USO DEL BANCO — Los Depósitos Se Reciben Bajo Las Condiciones Al Dorso

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CHASE — Depósito en The Chase Manhattan Bank, N.A.

Pdo. 23 — Sucursal 3/14/80 — Fecha

Depósito para la cuenta de 1033

LOPITO, ILEANA & HOWIE, INC.

Efectivo — Dolares 4500 —

Cheques Detallese 1 2 3 4 5 6 7 8

TOTAL 4500 —

MAR 14 '80

SOLAMENTE PARA USO DEL BANCO — Los Depósitos Se Reciben Bajo Las Condiciones Al Dorso

| | | | | | | |
|---|---|---|---|---|---|---|
| Check | | | 0 | | | |
| Less Dep. | | | 3 | | | |
| Cash Ret'd | | | | | | |

4,500

703 ... 290058 85

Comite Kenneth Pendleton

---

No. 11

March 19 80 — 101-234/216

Pay $ 12,500.00

150 DOLLARS

CASH

8 2 0 4 0 3 3 2 9 7

SWORN STATEMENT

I, Julio Héctor Morales, of legal age, married, Administrative Officer of an advertising agency and resident of San Juan, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above mentioned.

2. That I am employed in Lopito, Ileana & Howie, an advertising agency, doing business in San Juan, Puerto Rico.

3. That this agency performed part of the advertising for the Kennedy campaign in Puerto Rico.

4. That we received $168,962.33 of which $88,230.33 were paid in cash for the Kennedy Campaign media expenses.

5. That the Kennedy Campaign in Puerto Rico has completed their debts with our agency.

In San Juan, Puerto Rico, 17 of April, 1980.

Julio Héctor Morales

AFFIDDAVIT NO. 2121

Suscribed and sworn to before me by Julio Héctor Morales of the personal circumstances above mentioned.

In San Juan, Puerto Rico, 17 of April, 1980.

LUIS FRANCISCO HERNANDEZ VELEZ

Luis Francisco Hernández Vélez
Notary Public

Exhibit 39

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 800015

DATE Febrero 8, 1980.

CLIENT COmite Kennedy Presidente

JOB Produccion y Publicacion Anuncio Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Arte, Tipografia, mechanical, y publicacion Anuncio en el Mundo y el San Juan Star | | | 1,266.00 |

Ex. 2

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800001

DATE 2-21-80

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Feb. 22 a Feb. 29/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WQBS - 2 - 30" "Show de la Mañana" | | $ 420.00 | |
| WZNT-FM 7 30" "Lunes a Sabado | | $1,624.00 | |
| WIIQ 5 30" "Lunes a Viernes" | | 810.00 | |
| WAPA 2- 30" "Show de la Mañana | | 192.00 | |
| WLUZ 2 30" "Alegre Despertar y Hoy | | 480.00 | |
| WUNO 2- 30" "Ultima Hora" | | 432.00 | |
| WKVM 2 -30" "Show de la Mañana" | | 288.00 | |
| WBMJ - 5 30" "Lunes a Domingo | | 1,400.00 | |
| WZAR 5- 30" "Lunes a Viernes" | | 360.00 | |
| WPRP 5- 30" "Lunes a Domingo | | 240.00 | |
| COSMO - 5- 30" Lunes a Domingo | | 240.00 | |
| WAEL 5- 30" Lunes a Viernes | | 135.00 | |
| WALO - 5-30" Lunes a Viernes | | 150.00 | |
| WMIA - 5 30" Lunes a Domingo | | 116.00 | |
| WCMN 5 30" Lunes a Viernes | | 120.00 | |
| WUPR 5 30" Lunes a Viernes | | 120.00 | |
| WVJP 5 30" Lunes a Viernes | | 120.00 | |
| WNEL 5 30" Lunes a Viernes | | 180.00 | |
| WKAQ 4 30" Radio Reloj - Combo | | 1,579.00 | |
| WMDD 5 30" Lunes a Domingo | | 240.00 | |
| | | | $9,246.00 |

b2040329899

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 3

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 280007

DATE 2/22/80

CLIENT Comite Ke-nedy Presidente

JOB Cargos Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| OCHOA RECORDING STUDIOS | | | |
| (1 tape) #29046 | | $ 11.00 | |
| (2 tape) #28992 | | 20.00 | |
| (25 " ) #29137 | | 250.00 | |
| (20 " ) #29165 | | 200.00 | |
| | | | $481.00 |

8204053290

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 4

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800008

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios - televisión - Feb. 27 a Marzo 4, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ-TV | | | |
| 4-30" - Feb. 27 | | | |
| 2-30" - Feb. 28 | | | |
| 2-30" - Feb. 29 | | | |
| 1-30" - Marzo 1 | | | |
| 3-30" - Marzo 2 | | | |
| 3-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | $6,750.00 | |
| WAPA-TV | | | |
| 3-30" - Feb. 27 | | | |
| 4-30" - Feb. 28 | | | |
| 3-30" - Feb. 29 | | | |
| 1-30" - Marzo 2 | | | |
| 2-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | 5,165.00 | |
| II. WKBM-TV | | | |
| 1-30" - Feb. 28 | | | |
| 1-30" - Feb. 29 | | | |
| 1-30" - marzo 3 | | | |
| 1-30" - Marzo 4 | | 1,000.00 | |
| | | | $12,915.0 |

2040 3291

Ex. 5

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800009

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios Radio - Marzo 3 a Marzo 7, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - Radio<br>4-30" Radio Reloj | | $1,220.00 | $1,220.00 |

6204053299 2

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 6

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380011

DATE

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA RADIO MARZO 12/ MARZO 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ - 32 spots 30ss Radio Reloj | | $3,300.00 | |
| 2. WQBS - 91 " " | | 1,274.00 | |
| 3. WZNT - 77 " " | | 1,582.00 | |
| 4. WQII - 51 " " | | 1,056.00 | |
| 5. WAPA - 24 " " | | 384.00 | |
| 6. WUNO - 32 " " | | 1,152.00 | |
| 7. WKVM - 12 " " | | 288.00 | |
| 8. WBMJ - 40 " " | | 1,400.00 | |
| 9. WFID - 30 " " | | 420.00 | |
| 10. WIAC - 16 " " | | 288.00 | |
| 11. WZAR - 42 " " | | 504.00 | |
| 12. WPRP - 42 " " | | 294.00 | |
| 13. WOYE - 42 " " | | 252.00 | |
| 14. WAEL - 42 " " | | 189.00 | |
| 15. WMDD - 42 " " | | 336.00 | |
| 16. WALO - 42 " " | | 210.00 | |
| 17. WMIA - 42 " " | | 121.80 | |
| 18. WORO - 42 " " | | 417.90 | |
| 19. WCMN - 42 " " | | 168.00 | |
| 20. WUPR - 42 " " | | 168.00 | |
| 21. WVJP - 42 " " | | 168.00 | |
| 22. WNEL - 42 " " | | 252.00 | |
| 23. WPRM - 42 " " | | 504.00 | |
| 24. WXRF - 42 " " | | 252.00 | |
| 25. WHOY - 42 " " | | 168.00 | |
| 26. WXEW - 42 " " | | 126.00 | |
| 27. WENA - 42 " " | | 189.00 | |
| 28. WX100- 45 " " | | 450.00 | |
| 29. WLUZ - 30 " " | | 540.00 | |
| | | | $16,453.70 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 7

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO TELEVISION MARZO 5 A MARZO 11/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV | | | |
| 1-30ss Marzo 5 | | | |
| 2-30ss Marzo 6 | | | |
| 3-30ss " 3 | | | |
| 1-30ss " 8 | | | |
| 2-30ss " 9 | | | |
| 4-30ss " 10 | | | |
| 3-30ss " 11 | | $8,775.00 | |
| II. WAPA - TV | | | |
| 1-30ss Marzo 5 | | | |
| 3-30ss " 6 | | | |
| 2-30ss " 7 | | | |
| 1-30ss " 9 | | | |
| 2-30ss " 10 | | | |
| 2-30ss " 11 | | 4,800.00 | |
| III. WKBM - TV | | | |
| 1-30ss Marzo 2 | | 200.00 | $13,775.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 8

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800003

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB PRODUCCION ANUNCIO RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO 30SS - 2 SPOTS | | | |
| EJECUTORES, ESTUDIO, MEZCLA Y SUPERVISION | | 469.72 | |
| CARTRIDGES | | 500.00 | |
| | | | 969.72 |
| OCHOA RECORDING | 29184 | | 46.00 |
| | | | 1,015.72 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 9

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800004

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS RADIO Y TELEVISION

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV<br>2 30" MARZO 7 y 14 | | 1,000.00 | |
| I. WKAQ - RADIO<br>44 - 30" MARZO 7, 10 y 11 | | 2,248.00 | |
| | | | $3,248.00 |

6204037 2996

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 10

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380004-A

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB PRODUCCION - RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO<br>30SS - 2 - SPOTS<br>LOCUTORES, ESTUDIO, MEZCLA, MASTER,<br>DEMO Y SUPERVISION. | | 1,030.25 | |
| 75 CARTRIDGES | | 750.00 | |
| | | | $1,780.25 |

0204032

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 11

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380008

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB TELEVISION MARZO 8 A MARZO 15 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ -- TV<br>1 - 30" Marzo 8<br>1 - 30" " 10<br>3 - 30" " 12 | | $2,575.00 | |
| WAPA - TV<br>4 - 30" Marzo 8<br>2 - 30" " 9<br>1 - 30" " 10<br>2 - 30" " 11<br>2 - 30" " 13<br>4 - 30" " 15 | | $6,145.00 | $8,720.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 12

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380009

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TV MARZO 9 A MARZO 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKBM - TV | | | |
| 2-30" Marzo 9 | | | |
| 1-30" " 10 | | | |
| 1-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | $2,800.00 | |
| II. WLUZ - TV | | | |
| 1-30" Marzo 9 | | | |
| 3-30" " 10 | | | |
| 2-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | 2,025.00 | |
| | | | $4,825.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 13

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800010

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA - MARZO 13/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. EL MUNDO<br>MARZO 13 - 14"x5c | | $1,470.00 | |
| II. EL NUEVO DIA<br>MARZO 13, - 14 x 5c | | 1,105.00 | |
| III. SAN JUAN STAR<br>MARZO 13 - 14x6c | | 1,411.20 | |
| IV. EL VOCERO<br>MARZO 13 - 13 5c | | 975.00 | |
| | | | $4,961.20 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 14

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3780013

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 12 AL 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WAPA-TV<br>MARZO 12 - 4 spots 30ss<br>MARZO 13 - 3 spots 30ss<br>MARZO 14 - 4 spots 30ss | | | $3,715.00 |

8204026330001

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 15

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380014

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOUS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| L. 2VTR COPIES WLUZ | | 117.65 | |
| 2. ENTREGAS DE CARTRIDGES EN RADIO EMISORAS AREA METROPOLITANA E ISLA | | 100.00 | $217.65 |

8204063002

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 16

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800015

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13 AL 3-15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3 - 30 Marzo 12<br>2 - 30 Marzo 13<br>1 - 15 Marzo 15 | | | $2,450.00 |
| WKAQ - TV<br>2 - 30 Marzo 13<br>3 - 30 Marzo 14<br>2 - 30 Marzo 15 | | | 2,800.00 |
| WAPA - TV<br>4 - 30 Marzo 13<br>1 - 30 Marzo 14<br>3 - 30 Marzo 15 | | | 3,440.00 |
| | | | $8,690.00 |

8204030303

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 17

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 380016

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - TV<br>2 - 30" Marzo 12<br>4 - 30" Marzo 13<br>3 - 30" Marzo 14<br>1 - 30" Marzo 15 | | | $1,090.00 |
| WKMB - TV<br>1 - 30" Marzo 13 | | | 300.00 |
| WKBM TV<br>2-30" Marzo 12<br>3-20" Marzo 13<br>4-30" Marzo 14<br>4-30" Marzo 15 | | | 3,685.00 |
| | | | $5,075.00 |

820403004

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 18

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380017

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15-80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WAPA-TV<br><br>7 - 30ss Marzo 12<br>10- 30ss Marzo 13<br>13- 30ss Marzo 14<br>6 - 30ss Marzo 15 | | | $14,095.00 |

820406 3005

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 19

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380018

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO - 16 | | $1,365.00 | |
| EL MUNDO<br>14" x 5c MARZO 16 | | 1,470.00 | |
| SAN JUAN STAR<br>13 1/x x 6c MARZO 16 | | 1,411.20 | |
| EL VOCERO<br>13" x 5c MARZO 14 (2)<br>13" x 5c MARZO 15 (2) | | 2,080.00<br>2,080.00 | $8,406.20 |

8204033006

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 20

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800019

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| REPARTIR CARTRIDGES A RADIO EMISORAS DEL AREA METROPOLITANA Y FUERA DEL AREA. | | $100.00 | |
| VIAR COMUNICADOS PRENSA MENSAJERO ESPECIAL. | | 50.00 | $150.00 |

8204033007

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 21

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380020

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA - RADIO MARATON

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL MUNDO<br>6" x 3c Marzo 14 y 15 | | $612.00 | |
| EL NUEVO DIA<br>6" x 3 c MARZO 14 y 15 | | 612.00 | |
| EL VOCERO<br>6" x 3 c MARZO 14 y 15 | | 540.00 | $1,764.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 22

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380021

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13-y 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| COMITE KENNEDY PRESIDENTE: | | | |
| WAPA - TV | | | |
| 5 - 30 ss Marzo 13 | | | |
| 3 - 30 ss Marzo 14 | | | |
| 1 - 30 ss Marzo 15 | | | $3,000.00 |

0204073009

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 23

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380022

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA MARZO 15/80 DOBLE VOTO

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO 15 | | | $1,332.50 |
| EL MUNDO<br>14" x 5 c MARZO 15 | | | 1,505.00 |
| | | | $2,837.50 |

⑈204037301⑈

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 24

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3780023

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 13 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3- 30ss MARZO 13 | | | $1,300.00 |

b20403301

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 25

LOPITO, ILEANA & HOWIE, INC. Concordia #16, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800024

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Marzo 14 y 16

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ-Radio<br>16 spots - 30ss | | $ 976.00 | |
| 2. WKAQ-FM<br>45 spots - 30ss | | 390.00 | |
| | | | $=1,366.00 |

8204063012

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 26

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800025

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Programa Radial en Cadena - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WABA-Aguadilla | | $ 50.00 | |
| 2. WZAR-Ponce | | 150.00 | |
| 3. WKFE-Yauco | | 80.00 | |
| 4. WNIK-Arecibo | | 40.00 | |
| 5. WKVM-San Juan | | 200.00 | |
| 6. WVJP-Caguas | | 55.00 | |
| 7. WXRF-Guayama | | 96.00 | |
| 8. WEKO-Cabo Rojo | | 70.00 | |
| 9. WEGA-Vega Baja | | 55.00 | |
| 10. WOYE-Mayaguez | | 100.00 | |
| 11. WFBA-San Sebastian | | 60.00 | |
| 12. WMDD-Fajardo | | 100.00 | |
| 13. WLEY-Cayey | | 80.00 | |
| | | | $ 1,136.00 |

620403301 3

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 27

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380026

DATE 15 de marzo /80

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - Mayo 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 'El Día | | | |
| 6" x 3 c - marzo 15 | | $ 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 2. El Mundo | | | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 3. El Vocero | | | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| | | | $ 1,764.00 |

8204033014

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 28

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380027

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. El Mundo<br>14" x 11 c - marzo 16 (C.S.) | | $ 2,618.00 | |
| 2. El Mundo<br>14" x 5 c - marzo 16 | | 1,470.00 | |
| 3. El Mundo<br>14" x 5 c - marzo 16 | | 1,190.00 | |
| 4. El Nuevo Día<br>13" x 5 c - marzo 16 | | 1,105.00 | |
| | | | $ 6,383.00 |

620408330 15

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 29

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800028

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Entrega cartridges área metropolitana e interior de la isla - Jueves 13 y Viernes 14 (entregado por mensajero especial después de las 7:00 pm.) | | $250.00 | $250.00 |

6204053016

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 30

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800029

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 3 spots Radio - marzo 12/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutores, estudio, mezcla cartridges, supervisión. | | $ 1,159.17 | $ 1,159.17 |

b20405330017

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 31

LOPITO, ILEANA [redacted]OWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380030

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 2 spots radio

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutor, estudio, mezcla cartridges, supervisión. | | $ 594.86 | $ 594.86 |

0 2 0 4 0 5 3 0 1 8

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 32

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800031

DATE 17 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Programa de(1/2)media hora<br>6:30 a 7:00 pm.<br>Mensaje Rafael Hernández Colón<br>sobre las Primarias y Robert<br>Kennedy, Jr. | | $ 2,000.00 | $2,000.00 |

0204053019

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 33

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800032

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Grabación - Programa Hernández Colón /Kennedy

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - Grabación VTR para usarse en programa 30 minutos en WAPA. | | $1,000.00 | $1,000.00 |

620405330 20

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 34

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800033

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Mensaje Hernández Colón - WAPA - TV

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ-TV - 2 horas adicionales de edición y 1/2 hora grabación mensaje Rafael Hernández Colón marzo 14, 1980 | | 426.48 | $426.48 |

0204033021

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 35

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380003

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 5 spots - 30ss

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción 5 spots radio 30ss, locutores, estudio, mezcla, supervisión y 24 cartridges. | | 1,379.00 | $1,379.00 |

o2040533022

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 36

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800035

DATE 3-17-80

CLIENT Comité Kennedy Presidente

JOB Producción serie de anuncio para prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción serie de anuncios para la prensa y fotograbados. | | | $5,170.60 |

I 0204053303

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 37

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| We certify that this amount is correct and has been paid in full. | | | |

0 2 4 0 3 3 0 4

(Julio Morales)

I certify that this invoice is correct and ▬ payment has been made. It will be due at its presentation.

Ex. 38

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-726[illegible]

# invoice

NO. 2800012

DATE 2-1-80

CLIENT Comite Kennedy Presidente

JOB Producciones y Anuncios - Radio y Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| ALBERTO CARRION<br>JINGLE - KENNEDY | | | $ 5,800.00 |
| OCHOA RECORDING - Cassettes & cartridges 28941, 28985 | | | 736.00 |
| ANUNCIO PRENSA<br>Produccion y Publicacion | | | 353.00 |
| PRODUCCIONES LAYOUT, MECHANICAL<br>COPIES LETTERING , PHOTOSTATS<br>BROCHURE | | | 788.00 |
| ELMENDORF - PRINTING BROCHURE<br>10,000 OCPIES | | | 3,500.00 |
| CAMPAÑA RADIO<br>FEB 4 A FEB 9 | | | 5,999.00 |
| | | | 17,176.00 |
| Menos pago parcial | | | 5,000.00 |
| Balance de esta factura | | | $ 12,176.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit ("Ex.") 1

MEDIA

LOPITO,
ILEANA &
HOWE, INC.
Concordia 716,
Miramar
Puerto Rico
00907

82040333026

SAN JUAN
OCT 15 '81
P.R.

U.S. POSTAGE
$3.00

FEDERAL ELECTION COMMISSION
WASHINGTON, D. C. 20463

ATENTION MS. MARSHA GENTNER

October 15, 1981

Memorandum to: The Docket

From: Martha Gardner MHG

Subject: Letter to Orealis Orama in HLWR 1270

I understand that a letter and Commission order for respond to interrogatories ~~transmitted~~ addressed to Orealis Orama has been returned as undeliverable, no forwarding address. Since my calls to Puerto Rican directory assistance have proved unsuccessful (they do not have Ms. Orama listed), I have no way of obtaining a current address for this individual. However, I do request that the letter be kept in the permanent file in case I am subsequently able to locate this woman. Thank-you.

8204033027

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Official Business
Penalty for Private Use $300

POSTAGE AND FEES PAID

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

MOVED

Orealis Orama
Lopito, Illeana and Howie, Inc.
Concordia 716
Miramer, Puerto Rico

CERTIFIED

943084

87

24040333028

Rec'd 9-10-81

Min 1370 - Gutierrez

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:

Oralia Orozco

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 943084 | |

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY

SEP 14 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

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

SEP 14 1981

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 20, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Efrain Lopez, Jorge L. de Jesus,
Ileana Font, Directors
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramer, Puerto Rico

RE: MUR 1370

Dear Directors:

On July 17, 1981, the Commission sent you a subpoena to produce documents and answer written questions, returnable in fifteen (15) days. Our records show that you received that subpoena on July 20, 1981, thereby making your production and responses due on August 4, 1981. However, to date we have received no correspondence from you. In that the subpoenaed information is a necessary predicate to an expeditious resolution of the above-referenced matter, this letter is to inform you that if we do not receive those materials within 10 days of your receipt of this letter, or you do not contact us within that time to explain your failure to timely comply with the Commission subpoena, we will file an action in the United States district court to obtain that compliance. We would, of course, appreciate it if you would voluntarily come forth with the materials requested, thereby avoiding the inconvenience and expense both you and the Commission would incur if we must resort to compulsory process to complete our investigation of the above-referenced matter.

If you have any questions concerning the foregoing, please call Marsha Gentner, the attorney handling this matter, at (202) 523-4175. We look forward to hearing from you soon.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

0204033030

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 20, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Orealis Orama
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramer, Puerto Rico

RE: MUR 1370

Dear Ms. Orama:

On July 17, 1981, the Commission sent a subpoena to answer written questions issued to you and returnable within ten days. To date we have not received the responses to the interrogatories sent to you. Accordingly, this letter is to inform you that if we do not receive the responses to the Commission subpoena (or some explanation as to why these responses were not timely submitted) within ten days of your receipt of this letter we may be forced to file an action against you in the United States district court to obtain the information we seek. Obviously, we wish to avoid the inconvenience and expense such court action will work on you as well as the Commission, but we may have no other alternative if you persist in your failure to comply with the subpoena issued to you.

If you have any questions concerning the above, please call Marsha Gentner, the attorney handling this matter, at (202) 523-4175. We look forward to hearing from you soon.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

6204033031

P 204 033 032

MLK 1370 Gentes

PS Form 3811, JULY 1983

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

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

2. ARTICLE ADDRESSED TO:
Efrain Lopez, Jose L. de Jesus Leana Fort Meade

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 943085 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: AUG 3 1987 | POSTMARK

5. ADDRESSEE'S ADDRESS (Only if requested)

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

RETURN RECEIPT, REGISTERED AND CERTIFIED MAIL

☆GPO : 1979-305-465

RECEIVED
6604525
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GELBERG & ABRAMS
711 THIRD AVENUE
NEW YORK, N. Y. 10017
(212) 599-3200

BERTRAM A. ABRAMS
MITCHELL N. BARON
MICHAEL J. BERNER
FREDERICK GELBERG
FRANKLIN L. GREEN
JOHN A. HERFORT
PAUL R. HESSEL
MARC S. KIRSCHNER
LEWIS J. KORMAN
STEVEN M. SCHATZ
S. L. WARHAFTIG
JOEL S. ZWEIBEL

S. DONALD SUSSMAN*
FINANCE & INVESTMENTS
ADA S. HERZOG
MARVIN SUSSMAN
COUNSEL
CABLE ADDRESS:
GELBRAM, NEW YORK
TELEX:
*NOT ADMITTED TO PRACTICE LAW

August 6, 1981

CERTIFIED MAIL - RRR

Marshá Gentner, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20563

Re: Matter Under Review (MUR) 1370;
Subpoena to DHS Films, Inc.
dated July 13, 1981

Dear Ms. Gentner:

Enclosed herewith are signed responses to the written questions set forth in this subpoena to DHS Films, Inc. dated July 13, 1981, as modified pursuant to my letter to you of July 29, 1981.

Also enclosed are the documents responsive to the request for production on page 5 of the subpoena.

Please do not hesitate to call me if you have any questions.

Respectfully submitted,

John A. Herfort
Attorney for DHS Films, Inc.

JAH/jac
Encl.

AUG 10 P3:10
GENERAL COUNSEL

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FEDERAL ELECTION COMMISSION
UNITED STATES OF AMERICA

---

MATTER UNDER REVIEW (MUR) 1370

---

ANSWERS OF DHS FILMS, INC. TO INTERROGATORIES OF FEDERAL ELECTION COMMISSION DATED JULY 13, 1981

Introductory Statement

Pursuant to agreement between counsel for the Federal Election Commission ("FEC") and counsel for DHS FILMS, INC., the answers to the interrogatories set forth below are limited to matters involving DHS Films, Inc. and the Kennedy for President Committee/Puerto Rico. It is further understood that the answers to the interrogatories set forth below are submitted in confidence and will be kept in confidence in accordance with 11 C.F.R. § 111.21.

Interrogatory No. 1

Provide in detail the terms and conditions under which DHS Films, Inc. rendered services to KFP during the period of January 1, 1979 to December 31, 1980, and identify the person(s) who negotiated these terms and conditions on behalf of DHS Films, Inc., and KFP. Your response to this interrogatory should also specify the terms and conditions of any agreement for the extension of credit by DHS Films, Inc. to KFP, including the duration of any such extension of credit, and the circumstances under which the extension of credit would be granted.

(a) Indicate whether any of the above terms and conditions were set forth by virtue of an oral agreement, or if contained in a written contract or some other written memorialization; and provide the date of such oral or written agreement.

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Answer to Interrogatory No. 1

DHS Films, Inc. agreed to produce two television and two radio spot commercials for the Comite pro Kennedy (also known as the Kennedy for President Committee/Puerto Rico) to be broadcast during the period preceding Puerto Rico's 1980 Presidential primary election held in March, 1980.

The terms and conditions under which DHS Films, Inc. rendered these services were that Comite pro Kennedy would pay DHS Films, Inc. for the cost of producing the four spots, plus a 15 percent markup. There was no agreement between DHS Films, Inc. and Comite pro Kennedy for DHS Films, Inc. to extend credit to Comite pro Kennedy. Payment was to be made by Comite pro Kennedy to DHS Films, Inc. upon billing by DHS Films, Inc.

The aforementioned terms and conditions were not embodied in a written contract, but were agreed to orally by Mr. David Sawyer, President of DHS Films, Inc. and Mr. Miguel Lausel, representing Comite pro Kennedy, in a telephone conversation which Mr. Sawyer believes occurred in mid-January, 1980. Mr. Sawyer's home address is 131 East 66th St., New York City; his business address is 60 West 55th St., New York City. Mr. Sawyer has been President of DHS Films, Inc. throughout the period from January 1, 1979 to the present date.

DHS Films, Inc. billed Comite pro Kennedy for the work done in connection with the four spots upon completion

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of that work by marking the invoices to Comite pro Kennedy dated February 27, 1980. These invoices totalled $26,007.11 DHS Films, Inc. received payment totalling $26,000.00 on these invoices on March 25, 1980, June 24, 1980 and July 14, 1980. While DHS Films, Inc. recognized that Comite pro Kennedy's payments were not in conformity with the understanding that the invoices would be paid upon billing, it followed its usual practice and made a business decision -- based on the cost and burden of pressing for earlier full payment -- to permit the short period of lateness in payments without engaging in legal action or utilizing the services of a collection agency. In dealing with the matter of late payment by Comite pro Kennedy and in deciding to write off the unpaid portion of the invoices, i.e., $7.11, DHS Films, Inc. pursued the matter in a manner no different than that employed by DHS Films, Inc. with respect to non-political customers.

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Interrogatory No. 2

For each of Exhibits 1 through 2, attached hereto, provide the following information:

a) identify the person who prepared the document;
b) the date it was sent to KFP;
c) the date payment by KFP of the amount indicated on the document was due;
d) the date when payment of the amount due was received from KFP, and if such payment was made in installments or increments rather than a lump sum, provide the date and amount of each installment or increment;
e) for each payment listed in response to part d) of this interrogatory, indicate the form (i.e. cash, bank check, KFP check, money order, etc.) in which payment was made.

Answer to Interrogatory No. 2

(a) Each of the invoices referred to as Exhibit 1 and Exhibit 2 was prepared by the bookkeeper for DHS Films, Inc., Ms. Roslyn Schlesinger (whose home address is 520 E. 90th Street, New York City). Ms. Schlesinger is currently employed by DHS Films, Inc. and began her employment with DHS Films, Inc. in 1979. The address of DHS Films, Inc. for the period from January 1, 1979 to the present date has been 60 West 55th Street, New York, New York.

(b) Each of the invoices referred to as Exhibit 1 and Exhibit 2 was mailed to Comite pro Kennedy on February 27, 1980.

(c) Payment by Comite pro Kennedy with respect to each of the invoices referred to as Exhibit 1 and Exhibit 2 was due upon receipt of each invoice by Comite pro Kennedy.

(d) Payment of the invoices referred to as Exhibit 1 and Exhibit 2 was received in the following installments:

(i) March 25, 1980 -- $11,000

(ii) June 24, 1980 -- $10,000

(iii) July 14, 1980 -- $ 5,000

(e) The March 25, 1980 payment was received in the form of four bank checks made out to David Sawyer and subsequently endorsed by him to DHS Films, Inc., each dated March 19, 1980. The June 24, 1980 payment was made by deposit into the account maintained by DHS Films, Inc. with Banco Popular de Puerto Rico, i.e., Account No.

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90-01577-0. The July 14, 1980 payment was made by check sent to DHS Films, Inc. in New York City.

Interrogatory No. 3

3. Attached as Exhibits 3 and 4 are copies of four checks made to the order of David Sawyer. For each of these checks, provide the following:

a) whether the check was received by DHS Films, Inc. for services rendered or to be rendered to KFP;

b) if the answer to part a), above, is in the affirmative, the date the check was received;

c) identify the person(s) who transferred the check to DHS, Inc., or if that person is David Sawyer, identify the person who presented the check to David Sawyer;

d) describe the services provided or to be provided for which payment of the check was made by KFP, and the date(s) those services were actually rendered.

Answer to Interrogatory No. 3

(a) The originals of the checks set forth on Exhibits 3 and 4 were received in partial payment of the invoices referred to as Exhibit 1 and Exhibit 2, and were in partial payment for services rendered to Comite pro Kennedy.

(b) The originals of the checks set forth on Exhibits 3 and 4 were received at the DHS Films, Inc. offices at 60 West 55th Street, New York City, on or before March 25, 1980. The checks were deposited on March 25, 1980, in the account of DHS Films, Inc. with Chemical Bank in New York City.

(c) David Sawyer does not recall the manner in which the checks were transmitted to his office by Comite pro Kennedy.

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(d) The services provided for which partial payment was made by the checks, copies of which are set forth in Exhibits 3 and 4 were the following:

(i) Meetings in Puerto Rico involving Messrs. David Sawyer and Jeddu Mascoretto, representing DHS Films, Inc., to plan production of spots -- January 27, 1980.

(ii) Beginning of pre-production work in Puerto Rico with respect to the spots -- January 30, 1980.

(iii) Field production for radio spots -- February 6 and 7, 1980.

(iv) Filming of television spots -- February 8, 1980.

(v) Beginning of editing for spots -- February 13, 1980.

(vi) Delivery of spots -- February 26, 1980.

Dated: New York, New York
August 5, 1981

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**VERIFICATION**

State of New York )
) ss.:
County of New York )

DAVID SAWYER, being duly sworn, deposes and says:

I am the President of DHS Films, Inc.

I have read the foregoing answers to the interrogatories of the Federal Election Commission, dated July 13, 1981. To the best of my knowledge, information and belief, the foregoing answers are true.

David Sawyer
President, DHS Films, Inc.

Sworn to before me this
5 day of August, 1981

Notary Public

SANDRA L. COHAN
Notary Public, State of New York
No. 30-4687684
Qualified in Nassau County
Commission Expires March 30, 1983

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RECEIVED
81 AUG 10 AM 7:37

DHS FILMS, INC. 60 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

2/27/80

Miguel Lausel
Comite pro Kennedy
Avenida Roosevelt
244 Hato Rey
Puerto Rico 00918

Mr Miguel Rivera
Finance Dept
Partido Popular Democratico
P.O Box 4167
San Juan Puerto Rico 00920

Invoice # 985

**Production of Two Radio and Two Television Spots**

| | | |
|---|---|---|
| Cameraman | @ $500.00 p.d. | $ 1,500.00 |
| Assistant Cameraman | @ 190.00 p.d. | 490.00 |
| Rawstock & Labs | | 1,322.70 |
| Equipment | | 700.50 |
| Travel & Subsistence - including Mascoretta & Sawyer | | 3,744.20 |
| Narration Recording and Dupes | | 300.00 |
| Sprint Telephone & Messengers | | 300.00 |
| Editing | | 2,475.00 |
| Finishing | | 283.00 |
| Art Work | | 250.00 |
| Video Transfer & Assembly | | 2,260.00 |
| Video Dupes | | 140.00 |
| Stock Footage | | 1,200.00 |
| Narrator | | 600.00 |
| Production Manager | | 750.00 |
| David Sawyer | | 2,400.00 |
| Insurance | | 856.00 |
| Sub Total | | 19,571.40 |
| 15% Overhead | | 2,935.71 |
| Total | | $ 22,507.11 |

PAID
JUL 14 1980

Paid 3/25 11 000 00
bal due 11 507.11
Paid 6/13 / 10 000 00
bal 1507.11
7/14 1507.11
0.11

DHS FILMS, INC. 60 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

2/27/80

Miguel Lausel
Comite pro Kennedy
Ave. Roosevelt
244 Hato Rey
Puerto Rico 00918

Invoice # 986

Jeddu Mascoretto as line producer and director-writer of the Radio and TV spots - Kennedy Single and Tradition.....$3,500.00

PAID
JULY 1980

o20403330422

1/30/80

Checklist on the Kennedy campaign for Jeddu and for the office:

1. We're going into production to produce some Kennedy spots for the Puerto Rican primary campaign. They need to be completed by February 21st, so they can be aired within a day or two of that time.

2. Jeddu is preparing a budget, which calls for a local production, and a local company handling a certain amount of logistical work. Any work that we do here is going to be based on a cost plus 15% basis. In other words, the party is going to be using our facilities, and covering us at least for the overhead.

3. We need to work on the concept and theme of the campaign, although this will very much come out of the filming itself.

4. A New York film crew needs to be lined up to be sent down for the 8th and 9th. I think we should call it a 3- day shoot, given the fact that between a long travel day and work day plus another work day and travel day, andy hours will be put in.

C2040333043

# Banco Popular de Puerto Rico

D, H S FILMS INC
60 WEST 55 ST
NEW YORK N Y 10019

| DATE OF PREVIOUS STATEMENT | DATE OF THIS STATEMENT |
|---|---|
| 5/30/80 | 6/30/80 |

| ACCOUNT NUMBER | TYPE | CODE |
|---|---|---|
| | 1 | H |

| RATE | NO. OF DEPOSITS | FACTOR |
|---|---|---|
| .15 | 1 | 1 |

| DEBITS | | CREDITS | | | DATE | BALANCE |
|---|---|---|---|---|---|---|
| AMOUNT 8.64 | NO. 1 | UNITS 0 | AMOUNT 10,000.00 | | 0530 | 50000 |

| CHECKS & OTHER DEBITS | DEPOSITS | DATE | BALANCE |
|---|---|---|---|
| 864DM | 1000000 | 0624 | 1049136 |

8 2 0 4 0 3 3 3 0 4 4

## CHECKS IN SEQUENTIAL ORDER
## CHEQUES EN ORDEN NUMERICO

| CHECK NO. | AMOUNT | CHECK NO. | AMOUNT |
|---|---|---|---|
| | | | |

| | |
|---|---|
| | 1049136 |

E E REFIERE A ESTE ESTADO DENTRO DE DIEZ DIAS DEL ENVIO O ...OMAREMOS QUE EL MISMO ES DE SU CONFORMIDAD. TODOS ...ENTOS ACREDITADOS ESTAN SUJETOS AL PAGO FINAL

...O DE DEJARNOS CONOCER SI CAMBIA DE DIRECCION

IF NO ERROR IS REPORTED WITHIN TEN DAYS OF MAILING, THIS ... ACCOUNT WILL BE CONSIDERED CORRECT. ALL ITEMS ARE ... TO FINAL PAYMENT

BE SURE YOU LET US KNOW IF YOU CHANGE YOUR ADDRESS

...USE OF MANUAL CHECKS REDUCES YOUR AVAILABLE ACCOUNT

8 2 0 4 0 3 3 3 0 4 5

PPD

Núm. 3710

101-201
315

PARTIDO POPULAR DEMOCRATICO · 1980

BANCO POPULAR DE PUERTO RICO
Sucursal de Puerta de Tierra
San Juan, Puerto Rico

Apartado 5788, Puerta de Tierra, Puerto Rico 00906

9 de julio de 19 80

Páguese PAN-TIERRA Y LIBERTAD 5000 DOLS 00 CTS Dólares $ 5,000.00

A La Orden De

D H S Films, Inc.
60 West 555h Street
New York, N.Y. 10019

⑆021502011⑆ 012-009563⑈

PARTIDO POPULAR DEMOCRATICO

| Fecha | Descripción | Cantidad Bruta | Deducciones | Neto Pagado |
|---|---|---|---|---|
| | Partial payment of amount owed for special services rendered on March 1980. | | | $5,000.00 |

Desprenda y retenga este talonario. Cheque adjunto es en pago a partidas arriba mencionadas.

ERG & ABRAMS
THIRD AVENUE
YORK, N. Y. 10017

8204033330 46

81 AUG 10 A

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Marsha Gentner, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20563

CERTIFIED
P18 1873449
MAIL

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of

Kennedy for President Committee/
Puerto Rico

MUR 1370

RESPONSE TO SUBPOENA AND INTERROGATORIES

The Kennedy for President Committee ("the Committee) submits the following response to the Commission's Subpoena and Order of July 13, 1981, received on July 20, 1981.

Response to Interrogatories

1. A packet of instruction was sent to each field office and to each person who had signature authority on a local bank account. These instructions included specific directions with respect to the collection, reporting amd processing of contributions received by state and local organizations.

2. The Committee's records do not reflect the exact date on which we were informed of the existence of Banco de Santander account number (we assume this is the account the Commission is interested in although the order says account number . The Committee's best estimate is that it was during the month of May 1980. During preparation of our April 20, 1980 monthly report, the Committee did not receive any information from the Puerto Rico Committee on receipts or disbursements made in Puerto Rico. George Dalton, then in charge of disbursements, was sent to investigate the matter and a

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subsequent investigation was conducted by Michael Hill, the Committee's State Accounts Coordinator. After Mr. Hill's report, on June 18, 1980, the Committee ordered that no more contributions be deposited in or checks drawn on the Banco de Santander account.

3. We learned of these deposits at the same time we learned of the existence of the account. (See response to Question 2, supra.)

4. The contributions were reported on the Committee's comprehensive amendment filed on December 12, 1980. (Copy enclosed with our letter of April 20, 1981).

5. We wrote Sr. Miguel Lausell and requested he forward to us any of the requested documents in his possession. A copy of this letter was sent to the Commission. To date we have not received a response to the letter.

6. As far as the Committee is aware, the account is still open with a balance of $344.06, which was its balance on June 18, 1980, when we ordered it frozen.

7. No.

8. State Accounts Coordinator Michael Hill conducted an investigation in Puerto Rico during June 1980. He was informed of the radio marathon and receipts therefrom at that time by Rene Sanfiorenzo.

9. See response to question 8.

10. The Committee does not know who made the entries.

11. We were informed of the cash payment by Julio Hector Morales of the firm of Lopito, Ileana and Howie during April

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1980, (See Morales Affidavit).

12. The Committee does not know who made the entries.

13. The Committee believes they were obtained by State Accounts Coordinator Michael Hill during his June 1980 investigation.

Documents

A. No such documents have been found.

B. Sr. Rivera appears to be referring to invoice number 380001 dated March 17, 1980, signed by Julio Hector Morales of the firm of Lopito, Ileana & Howie that contains a certification that the amount owed has been paid in full. This document has already been provided the Commission, but an additional copy is enclosed as Exhibit 1.

C. In preparing this response we discovered that additional records pertaining to Banco de Santander account number were in our files. Specifically, we found bank statements for January through September 1980 and a number of cancelled checks. All but one of the checks to Lopito, Ileana & Howie were found. The missing check is number 17 for $1,266. The other checks to Lopito, Ileana & Howie were checks number 12,1a,2A 5A, 6A, 8 and 16A. Copies of these checks and all other statements and checks found are enclosed since this information was requested in the Commission's February 25, 1981, Subpoena.

D. The only such records we have are those already provided to the Commission.

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I hereby swear that the responses given above are true, complete and accurate to the extent of my information and belief.

William C. Oldaker
Treasurer, Kennedy for President Committee

AUG 10 1981
Date

CITY OF WASHINGTON )
DISTRICT OF COLUMBIA ) SS.

I, DOROTHEA M. ADGATE, a Notary Public in and for District of Columbia, duly commissioned and qualified, hereby certify that there appeared before me, William C. Oldaker, to me personally known, who swore that the responses given above are true, complete and accurate to the extent of his information and belief.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 10th day of August, 1981, at Washington, D.C.

Dorothea M. Adgate
Notary Public

My Commission expires: 9/30/81

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| We certify that this amount is correct and has been paid in full. | | | |

0 2 0 4 0 3 3 3 3

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

EXHIBIT 1

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 12, 1981

Miguel A. Rivera
1030 Popular Center Bldg.
Hato Rey, Puerto Rico 00918

RE: MUR 1370

Dear Mr. Rivera:

I understand that you did not have an opportunity to review the transcript of your deposition taken May 5, 1981. Accordingly, I have enclosed a copy of that transcript. Please read it, and if any corrections are necessary, return it with those corrections in the enclosed self-addressed envelope within two weeks of your receipt of this letter.

If you have any questions or problems, please call Marsha Gentner at (202) 523-4175.

Sincerely,

Kenneth A. Gross
Associate General Counsel

cc: William C. Oldaker

Enclosure

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[redacted]

[redacted]

[redacted]

RECEIVED
GCC #5163
81 JUL30 AM : 58

GELBERG & ABRAMS
711 THIRD AVENUE
NEW YORK, N. Y. 10017
(212) 599-3200

BERTRAM A. ABRAMS
MITCHELL N. BARON
MICHAEL J. BERNER
FREDERICK GELBERG
FRANKLIN L. GREEN
JOHN A. HERFORT
PAUL R. HESSEL
MARC S. HIRSCHNER
LEWIS J. KORMAN
STEVEN M. SCHATZ
S. L. WARHAFTIG
JOEL B. ZWEIBEL

S. DONALD SUSSMAN*
FINANCE & INVESTMENTS

ASA D. HERZOG
MARVIN SUSSMAN
COUNSEL

CABLE ADDRESS
GELBRAM, NEW YORK
TELEX: 666648

*NOT ADMITTED TO PRACTICE LAW

July 29, 1981

Marsha Gentner, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Matter Under Review (MUR) 1370;
Subpoena to DHS Films, Inc.,
dated July 13, 1981

Dear Ms. Gentner:

This letter is to confirm our conversation of Friday, July 24, 1981, during which you agreed, on behalf of the Federal Election Commission ("FEC"), that DHS Films, Inc., which I represent in connection with the FEC subpoena dated July 13, 1981, may limit its response to that subpoena - with respect both to the interrogatories set forth on pages 3-4 thereof and to the document production request on page 5 thereof - to matters involving DHS Films, Inc. and the Kennedy for President Committee/Puerto Rico.

Thank you for your assistance.

Very truly yours,

John A. Herfort

John A. Herfort
Attorney for DHS Films, Inc.

JAH/11

9204053054

81 JUL30 P1:45

GELBERG & ABRAMS
711 THIRD AVENUE
NEW YORK, N.Y. 10017

81 JUL30 A11:58

Marsha Gentner, Esq.
Office of the General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

2040333035

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Orealis Orama
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: Matter Under Review (MUR) 1370

Dear Ms. Orama:

Enclosed please find a subpoena to answer written questions issued to you by the Federal Election Commission ("Commission") in connection with the above-referenced matter under review. The subpoena requires that your respond to the interrogatories propounded therein by sending them to the Commission within ten (10) days of your receipt of the enclosed subpoena.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits any person from making public the fact of "any notification of investigation" by the Commission unless the respondent instructs the Commission, in writing, to make the investigation public. No such written permission has been received in this matter.

If you have any questions, please call Marsha Gentner, the attorney handling this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

6204033056

[redacted]

Charles A. Steele
General Counsel

Mr. Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO ANSWER WRITTEN QUESTIONS

TO: Orealis Orama
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: MUR 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1), Orealis Orama is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, by mailing same, to the Federal Election Commission, Office of General Counsel, 1325 K Street, N.W., Washington, D.C., 20463 within ten (10) days of receipt of this subpoena.

Please respond to the following interrogatories:

1. What is your position with Lopito, Ileana and Howie, Inc.

a) How long have you held that position?

2. Were you present on any occasion with Senior Julio Hector Morales when payment of cash was received from any person on behalf of the Kennedy for President Committee/ Puerto Rico ("KFP/PR")?

3. If the answer to Interrogatory 2, above, is in the affirmative, provide the date of each such cash payment for which you were present, the amount of cash received on that date, the container (i.e. suitcase, bags, etc.) the money was brought in to Lopito, Ileana and Howie, Inc., and the name and address of every other person

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person present who witnessed the aforementioned transfer(s) of cash from KFP/PR to Lopito, Ileana and Howie, Inc.

WHEREFORE, the Chairmanof the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this 16th day of July, 1981.

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033059

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Oldaker, Esquire
Graham and James
1050 17th Street, N.W.
12th Floor
Washington, D.C. 20036

RE: Matter Under Review (MUR) 1370

Dear Mr. Oldaker:

Enclosed is a subpoena to produce certain documents and materials and order to anwswer written questions issued by the Federal Election Commission ("Commission") to the Kennedy for President Committee.

The subpoena requires that production of specified documents be made at the time and place stated therein and that responses to the interrogatories be propounded to the Commission within ten (10) days of your receipt of the enclosed order.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY; Kenneth A. Gross
Associate General Counsel

Enclosures: Subpoena

cc: Kennedy for President Committee
P. O. Box 3743
Washington, D.C. 20007

0204033060

Mulk 1370-Gen

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
William C. Oldaker

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 438571 | |

(Always obtain signature of addressee or agent)

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

K D Brunton

4. DATE OF DELIVERY — POSTMARK

JUL 29 1981

5. ADDRESS (Complete only if requested)

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

☆GPO : 1979-

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

820403330611

Enclosures: Subpoena

cc: Kennedy for President Committee
P. O. Box 3763
Washington, D.C. 20007

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND TO ANSWER WRITTEN QUESTIONS

TO: Kennedy for President Committee
P. O. Box 3743
Washington, D.C. 20007

RE: MUR 1370

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(1) and (3), the Kennedy for President Committee is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the Kennedy for President Committee, the Kennedy for President Committee/ Puerto Rico, or of any of the officers, agents, staff members, volunteers or employees of these two committees. Production is to be made at the Office of General Counsel of the Federal Election Comission, 1325 K Street, N.W., Washington, D.C., on August 7, 1981, at 10:00 a.m. In addition, the Kennedy for President Committee is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of thie subpoena.

0204033306 3

DEFINITIONS AND INSTRUCTIONS

Unless otherwise noted, as used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings of any kind, of printed, audio, visual, or electronic

materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, computer print-outs, invoices, account statements, billing forms, receipts, checks and other negotiable paper, solicitation materials, records and compilations which are in the possession, custody or control of the Kennedy for President Committee and the Kennedy for President Committee/Puerto Rico. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials".

2. "Kennedy for President Committee" or "KFP" shall mean the principal campaign committee to whom this subpoena is addressed, and its past and present officers, agents, employees, staff and volunteers.

3. "Kennedy for President Committee/Puerto Rico" or "KFP/PR" shall mean the KFP affiliate committee authorized by Senator Kennedy to receive contributions and make expenditures on his behalf with respect to the Senator's campaign for the 1980 Democratic nomination for the office of President, and the committee's past and present officers, agents, employees, staff and volunteers.

4. "Identify" with respect to a person shall mean to give the full name, last known residence address of such individual, the last known place of business where such inidividual is or was employed, the title of the job or position held with the committee or group in question, and the dates of such service.

5. "Identify" with respect to a document shall mean the title, if any, the type of communication (for e.g. letter, memorandum, telegram, etc.), the person to whom it is addressed and the person who signed it (if applicable), the date, and a brief description of its content.

6. "Identify" with respect to a disclosure report filed with the Federal Election Commission shall mean the title of the report, the FEC form number, and the date the report was filed with the Commission.

0 2 0 4 0 3 3 3 0 6 4

7. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this subpoena any documents and responses which may be construed to be out of their scope.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information.

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please respond to the following interrogatories:

1. Did KFP give any instructions to KFP/PR, or designate any procedures to be followed, with respect to the collection, reporting and processing of, and recordkeeping for, contributions received by KFP/PR.

a) If so, what were these instuctions or designations, in what form (i.e. by letter, memorandum, orally, etc.) were they communicated to KFP/PR, and when were they so communicated.

2. When did KFP first learn that an account had been opened by KFP/PR at Banco de Santander, Puerto Rico? (See Letter of W. C. Oldaker to Charles N. Steele dated December 2, 1980.)

0204033306 5

a) Identify the person or document from whom KFP obtained this information.

3. For each deposit listed below, provide the date when KFP learned that a deposit in that amount had been made by KFP/PR into its account . at Banco de Santander. (See Letter of W. C. Oldaker to Charles N. Steele dated December 2, 1980.)

| Deposit Amount | Date of Deposit |
|---|---|
| $4,000 | 2/26/80 |
| 2,000 | 2/28/80 |
| 20 | 3/19/80 |
| 6,325 | 4/11/80 |
| 365 | 6/13/80 |

4. Records submitted by KFP indicate that the deposit of $6,325 made on April 11, 1980 (referred to in Interrogatory 3, above) was comprised of, inter alia, contributions which exceeded $200. Identify the KFP report filed with the Federal Election Commission in which the identity (as that term is used in 2 U.S.C. §§ 431(13) and 434(b)) of the individuals who made these contributions was disclosed.

5. In KFP's response to Commission interrogatories of February 25, 1981, it is stated in response to Request E (at page 2 of KFP's response) that the information subpoenaed would be provided to the Commission "when available". Please provide that information in response to this subpoena or indicate its unavailability and the reason(s) for that unavailability.

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6. Provide the date, if any, that KFP/PR account #008-3511 at Banco de Santander, Puerto Rico was closed, and the balance of the account on that date.

a) If the balance of KFP/PR account [redacted] exceeded $0 when the account was closed, identify the transferee/recipient of those funds.

7. Did KFP give prior approval of, authorize, request, or suggest that KFP/PR undertake and sponsor the "radio marathon" it held in March, 1980, in Puerto Rico?

8. If the answer to Interrogatory 7, above, is in the negative, provide the date KFP learned of the aforementioned "radio marathon", and identify the person(s) or document(s) which were the source of this knowledge.

9. Identify the person(s) or document(s) which were the source from whom KFP learned that approximately $99,000 was received by KFP/PR from its "radio marathon", and the date that information was first communicated to KFP. (See letter of W. C. Oldaker to Charles N. Steele, dated December 2, 1980).

10. Attached are Exhibits 1 to 7. Identify the individual who wrote in the additional entries contained on each of these documents (i.e. the person who wrote the entries that are written in hand as oppposed to type print), and the date these entries were made.

11. When did KFP first learn that a payment of approximately $88,000, in cash, had been made by KFP/PR to Lopito, Ileana, and Howie, Inc., of Puerto Rico? Identify the source of the aforementioned information obtained by KFP.

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12. Identify the person(s) who prepared each of Exhibits 8 through 15, attached hereto, and the person(s) and documents which were the source(s) from whom the information was obtained which was used to prepare Exhibits 8 through 15.

13. Identify the person who obtained the checks, copies of which are contained on Exhibits 16 through 17, attached hereto.

Please provide the following in their entirety:

A. Copies of any documents and materials sent by KFP to KFP/PR that describe, designate, deal with, or otherwise refer to any procedures to be followed by KFP/PR in making expenditures and in receiving contributions.

B. Mr. Miguel A. Rivera, a volunteer of KFP/PR, has provided sworn testimony stating that he obtained a receipt for an $88,000 cash payment made by him on behalf of KFP/PR to Lopito, Ileana and Howie, Inc. of Puerto Rico, and that he gave this receipt to KFP/PR. Please provide that receipt.

C. All documents and materials from which information was obtained which was used to prepare Exhibits 8 through 15. If these documents have already been provided to the Commission, please identify them.

D. All documents containing a record (as required by 2 U.S.C. § 432(c)(2)) of the name and address of each person

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who made a contribution to KFP/PR in excess of $50. (Supporting materials accompanying the W. C. Oldaker letter of December 2, 1980 to Charles N. Steele, and the KFP response to Commission interrogatories indicate that at least two bank account deposits made by KFP/PR, one for $6,325 and one for $365, were comprised, inter alia, of contributions in excess of $50.)

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this 13th day of July 1981.

John Warren McGarry
Chairman

ATTEST:

Marjorie E. Emmons
Secretary to the Commission

0204033069

LOPITO, ILEANA & HOWE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (Deliveries and others) | | | 168,962.33 |
| | Payments | Ck # 12 | (5 000.00) |
| | | Ck # 17 | (1 266.00) |
| | | Ck # 18 | (12 176.00) |
| | | | 150,520.33 |
| | | Ck # 24 | (23 790.00) |
| | | | 126,730.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 1

LOPITO, ILEANA & H[illegible]E, INC. Concordia 7[illegible]3, Miramar, P.R. [illegible]07 Tel. 724-7200.

# INVOICE

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 1[illegible] | 5 000.00 |
| | | # 17 | 1 266.00 |
| | | # 111 | 12, 176.00 |
| | | # 2H | 23, 746.60 |
| | | # 5H | 10, 000.00 |
| | | | 116, 730.33 |
| We certify that this amount is correct and has been paid in full. | | ck # 5A | 12, 000.00 |
| | | | 104, 730.33 |
| | | ck # 4H | 4, 000.00 |
| | | | 100, 730.33 |

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

[redacted]

Exhibit 2

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | | ck N°12 | (5000.00) |
| | | ck N 17 | (1266.00) |
| | | ck N 1A | (12 176.00) |
| | | ck N 2A | (23,790.00) |
| | | ck N 5A | (10,000 00) |
| | | | 116,730.33 |
| | | ck 6A | (4 000.00) |
| | | | 112,730.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julio Howie)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 3

LOPITO, ILEANA & HO[illegible]E, INC. Concordia 716, Miramar, P.R. [illegible]07 Tel. 724-7260.

# Invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5,000.00) |
| | | ck # 17 | (1,266,00) |
| | | ck # 18 | (12,176.00) |
| | | ck # 21 | (23,790.00 |
| | | | 126,730.33 |
| | | ck # 24 | (10,000.00 |
| We certify that this amount is correct and has been paid in full. | | | 116,730.33 |

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 4

LOPITO, ILEANA & HOWE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (Deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5 000.00) |
| | | ck # 11 | (1 266.00) |
| | | | 162,696.33 |
| | | ck # 14 | (12, 176.00) |
| | | Balance | 150,520.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julia Hawkes)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 5

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payment | ck # 12 | -( 5 000.00) |
| | | | 163,962.33 |
| | | ck # 17 | -( 1 266.00) |
| | | Balance | 162,696.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 6

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# INVOICE

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | | Payment | (5000.00) |
| | | Balance | 163,962.33 |

We certify that this amount is correct and has been paid in full.

(Julia Howie)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 7

# Kennedy for President Committee

CHECK REQUEST — VENDOR PAYMENT

☐ VENDOR BILL ATTACHED

☐ VENDOR BILL TO FOLLOW

DATE 9/1/59

VENDOR NAME: Yates, Glenn & Hare, Inc.

VENDOR ADDRESS: Comanche 116

CITY, STATE, ZIP: Murrieta, Ca.

AMOUNT DUE: 12,500.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on Lease

see attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 16 A

DATE: 3-12-60

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

Exhibit 8

Total 16), 962.33

Payments:

| | | |
|---|---|---|
| ck # | 12) | 5,000.00 |
| | 17) | 1,266.00 |
| | 1H) | 12,176.00 |
| | 2H) | 23,790.00 |
| | 5H) | 16,000.00 |
| | 6H) | 4,000.00 |
| | 9H) | 12,000.00 |
| | 16A) | 12,500.00 |

88,230.33 Balance paid in cash

0 2 0 4 0 3 3 3 0 7 8

# Kennedy for President Committee

**CHECK REQUEST** — **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED — DATE 5/1/60

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Litt, Bjorn & Hess, Inc.

VENDOR ADDRESS: Columbia Pic

CITY, STATE, ZIP: Murray, Ky. 42071

AMOUNT DUE: $22,780.00

STATE (In which services are rendered)

PARTICULARS (Include dates and events) Payment on balance

See attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 2A

DATE: 5-20-60

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 9

# Kennedy for President Committee

VENDOR PAYMENT

CHECK REQUEST

DATE 5-1-80

☐ VENDOR BILL ATTACHED

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Lipsitz, Hiam & Horey, P.C.

VENDOR ADDRESS: Executive 716

CITY, STATE, ZIP: Metairie, LA 70001

AMOUNT DUE: $12000.00

STATE (In which services are rendered)

PARTICULARS (include dates and events) Payment on balance due as billed

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 5A

DATE: 5-7-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

Exhibit 10

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 5/1/80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Legator, Allison & Nowak, Inc.

VENDOR ADDRESS: Concourse 716

CITY, STATE, ZIP: Marietta, GA 30067

AMOUNT DUE: $10,000.00

STATE (In which services are rendered)

PARTICULARS (include dates and events) Payment re Labor

See attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 517

DATE: 5-28-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 11

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 2/11/60

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Loyola, Adams & Harris Inc

VENDOR ADDRESS: Conrad 716

CITY, STATE, ZIP: Wash., D.C. 20036

AMOUNT DUE: $12,176.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on Invoice

See attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 1A

DATE: 2-20-60

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 12

0 8 2 3 0 4 0 3

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 3/1/60

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Frank Ulman Motors Inc

VENDOR ADDRESS: Evanston 716

CITY, STATE, ZIP: Evanston, Ill. 60202

AMOUNT DUE: $1266.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on Lease

see attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 17

DATE:

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 13

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 5-1-80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Lopata, Libman and Harris

VENDOR ADDRESS: Cinerama # 716

CITY, STATE, ZIP: Miami, FL 33167

AMOUNT DUE: $5,000.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on $185,962.37 (See attached)

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 12

DATE: 1-24-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 14

8204033084

# Kennedy for President Committee

**CHECK REQUEST** — **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED — DATE 3/1/84

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Kapla, Edward L. Esq., P.C.

VENDOR ADDRESS: Lancaster, PA

CITY, STATE, ZIP: Lancaster, PA 17603

AMOUNT DUE: $400.00

STATE (In which services are rendered)

PARTICULARS (include dates and events) Payment on Expenses (see attached)

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 64

DATE: 3-4-84

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 15

OFFICIAL CHECK

# BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

90040183

58-12-1

MARCH 12 1980 $3,000.00

PAY TO THE ORDER OF DAVID SAMTER

B.P.P.R. 3000 00

DOLLARS

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

"90040183" :0260-0881: 90-5000 3-0"

OFFICIAL CHECK

# BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

90040186

58-12-1

MARCH 12 1980 $2,000.00

PAY TO THE ORDER OF DAVID SAMTER

B.P.P.R. 2000 00

DOLLARS

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

"90040186" :0260-0881: 90-5000 3-0"

Exhibit 16

OFFICIAL CHECK

# BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

90040184

53-12-1

MARCH 19,1930. $**3,000.00**

PAY TO THE ORDER OF DAVID SAWYER

POPULAR CONFIRMING 3000 DOLS 00 CTS DOLLARS

OVER $500.00 REQUIRES TWO SIGNATURES

Aaron M. Alter 10-31

AUTHORIZED SIGNATURE

Marcia Adam Lowe

COUNTERSIGNATURE E-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑆90040184⑆ ⑆0260-0884⑆ 90-9000 3-0

OFFICIAL CHECK

# BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

90040185

58-12-1

MARCH 19,1930. $**3,000.00**

PAY TO THE ORDER OF DAVID SAWYER

POPULAR CONFIRMING 3000 DOLS 00 CTS DOLLARS

OVER $500.00 REQUIRES TWO SIGNATURES

Aaron M. Alter 10-31

AUTHORIZED SIGNATURE

Marcia Adam Lowe

COUNTERSIGNATURE E-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

8 7 0 3 3 4 0 4 8

⑆90040185⑆ ⑆0260-0884⑆ 90-9000 3-0

Exhibit 17

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Efrain Lopez, Jorge L. de Jesus,
Ileana Fort, Directors
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: Matter Under Review (MUR) 1370

Dear Directors:

Enclosed is a subpoena to produce certain documents and materials and to answer written questions issued by the Federal Election Commission ("Commission") to Lopito, Ileana and Howie, Inc., in connection with the above referenced matter under review.

The subpoena requires that production of specified documents be made and that responses to the interrogatories be propounded, to the Commision within fifteen (15) days of your receipt of the enclosed subpoena, by sending them certified mail to the address noted in the subpoena.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits any person from making public the act of "any notification of investigation" by the Commission unless the respondent instructs the Commission, in writing, to make the investigation public. No such written permission has been received in this matter.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure: Subpoena

8204033088

MUK1370 - Mentes

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Efrain Lopez, Jr. Esq.
de Jesus Mena Int.

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 438569 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: JUL 20 1981

POSTMARK: SAN JUAN PUERTO RICO JUL 20 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

81 JUL 27 A8:46

RECEIVED

GPO : 1979-

8 2 0 4 0 3 3 3 0 8 9

[redacted]

Sincerely,

Charles N. Steele
General Counsel

[redacted]
Associate General Counsel

7/15/61

Enclosure: Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND TO ANSWER WRITTEN QUESTIONS

TO: Efrain Lopez, Jorge L. de Jesus,
Ileana Fort, Directors
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: MUR 1370

2040330091

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), Lopito, Ileana and Howie, Inc., is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possesion or control of Lopita, Ileana and Howie, Inc. or of any of its directors, officers, agents, or employees. Production is to be made by sending the documents, certified mail, to the Office of General Counsel of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C., within fifteen (15) days of receipt of this subpoena. In addition, Lopito, Ileana and Howie, Inc. is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission at the address of above, also within fifteen (15) days of receipt of this subpoena.

DEFINITIONS AND INSTRUCTIONS

As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings or printed materials of any kind, including but not limited to correspondence, memoranda, reports, transcripts, minutes, notes, letters, lists, telexes, telegrams, messages (including reports, notes memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, computer print-outs, invoices, account statements, billing forms, receipts, checks and other negotiable paper, records and compilations in the possession, custody or control of Lopito, Ileana, and Howie, Inc., or its directors, officers, agents and employees. Designatated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials".

2. "Lopito, Ileana, and Howie, Inc.," shall mean the corporation to whom this subpoena is directed, and its directors, officers, employees and agents.

3. "Kennedy for President Committee/Puerto Rico" or "KFP/PR" shall mean the political committee located in Puerto Rico which was authorized by Senator Edward Kennedy to make expenditures and receive contributions on behalf of his campaign for the 1980 Democratic nomination for the Office of President, and the committee's officers, employees, staff, agents, and volunteers.

4. "Identify" with respect to a person shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the committee or group in question, and the dates of such service.

5. "KFP/PR account" shall mean the relationship between Lopito, Ileana, and Howie, Inc., and KFP/PR by virtue of which the corporation provided media, production, consulting, campaign, or other services to KFP/PR from the period of January 1, 1979 through December 31, 1980.

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6. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this subpoena any documents and responses which may otherwise be construed to be out of their scope.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information.

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please respond to the following interrogatories:

1. Identify the person(s) in charge of, or who had supervisory responsibility for, the KFP/PR account with Lopito, Ileana, and Howie, Inc.

2. Provide in detail the terms and conditions under which Lopito, Ileana, and Howie, Inc., rendered services to KFP/PR in 1979-1980, and identify the persons who negotiated the terms and conditions on behalf of Lopito, Ileana and Howie, Inc., and KFP/PR. Your response to this interrogatory should also specify the terms and conditions of any agreement for the extension of credit by Lopita, Ileana and Howie, Inc. to KFP/PR, including the duration of any such extension of credit, and the circumstances under which the extension of credit would be provided.

6204033309 3

a) Indicate whether any of the above terms and conditions were set forth by virtue of an oral agreement, or if contained in a written contract or some other written memorialization, and provide the date of such oral or written agreement.

3. For each of Exhibits 1 to 38, attached hereto, provide the following information:

a) identify the person who prepared the document;

b) the date it was sent to KFP/PR;

c) the date payment by KFP/PR of the amount indicated on the document was due;

d) the date when payment of the amount due was received from KFP/PR, and if such payment was made in installments or increments rather than a lump sum, provide the date and amount of each installment or increment;

e) for each payment listed in response to part d) of this interrogatory, indicate the form (i.e. cash, bank check, KFP/PR check, money order, etc.) in which payment was made.

4. Did Lopito, Ileana, and Howie, Inc. receive any payments in cash or coin from KFP/PR? If your response to this interrogatory is in the affirmative, provide the following information for each such cash payment:

a) the date the payment was made;

b) the amount of cash received;

c) identify the person(s) who tendered the cash to Lopito, Ileana, and Howie, Inc.;

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d) identify the person(s) who received the cash on behalf of Lopito, Ileana, and Howie, Inc.;

e) indicate whether anyone on behalf of KFP/PR notified Lopito, Ileana and Howie, Inc. that KFP/PR would be tendering a cash payment, prior to receipt of that payment by Lopito, Ileana and Howie, Inc., and identify the person who communicated that notification on KFP/PR's behalf, as well as the date of any notification to that effect;

f) indicate whether Lopito, Ileana, and Howie, Inc. provided any receipt or other written memorialization of the cash payment at the time it was received from KFP/PR;

g) the location where the cash was kept while at Lopito, Ileana, and Howie, Inc.;

h) state whether the cash was deposited in a bank account, along with the date of the deposit, or if the cash was not deposited in a bank account, identify the person to whom it was transferred;

i) indicate whether the cash was paid for services already provided at the time of payment or to be rendered at some future date after payment, and if the latter, when such services were actually performed;

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j) if there existed any formal or informal agreement between KFP/PR and Lopito, Ileana, and Howie, Inc., at the time the cash payment was made that all or any part of the cash received would be put in escrow or otherwise reserved or held as security for payment by check, or to be used for some future (and at that time) undetermined services, provide the terms and conditions of such escrow/reservation, the amount set aside pursuant to that agreement, and identify the person(s) who had custody of the cash in escrow or that was set aside.

5. Describe the duties and responsibilities of your employee Julio Hector Morales, with respect to the KFP/PR account.

6. Was the affidavit of Julio Hector Morales, a copy of which is attached hereto as Exhibit 39, executed on behalf of Lopito, Ileana, and Howie, Inc.? If your answer to this interrogatory is in the affirmative, indentify the person(s) who requested Senior Morales to draw up his affidavit and the reason why that request was made.

Produce the following in their entirety:

A. All documents and materials which contain, concern, or in any way refer to the terms and conditions under which Lopito, Ileana, and Howie, Inc. provided services to KFP/PR during the period of January 1, 1979 through December 31, 1980.

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B. All documents and materials which record, refer to, or otherwise indicate the receipt of a payment from KFP/PR to Lopito, Ileana, and Howie, Inc., for services rendered or to be rendered.

C. All invoices, bills, or other statements of account concerning services provided or to be provided by Lopito, Ileana, and Howie, Inc. to KFP/PR.

WHREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this 13th day of July 1981.

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033097

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-720[illegible]

# invoice

NO. 2800012

DATE 2-1-80

CLIENT Comite Kennedy Presidente

JOB Producciones y Anuncios - Radio y Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| ALBERTO CARRION JINGLE - KENNEDY | | | $ 5,800.00 |
| OCHOA RECORDING - Cassettes & cartridges 28941, 28985 | | | 736.00 |
| ANUNCIO PRENSA Produccion y Publicacion | | | 353.00 |
| PRODUCCIONES LAYOUT, MECHANICAL COPIES LETTERING, PHOTOSTATS BROCHURE | | | 788.00 |
| ELMENDORF - PRINTING BROCHURE 10,000 OCPIES | | | 3,500.00 |
| CAMPAÑA RADIO FEB 4 A FEB 9 | | | 5,999.00 |
| | | | 17,176.00 |
| Menos pago parcial | Cheque | | 5,000.00 |
| Balance de esta factura | | | $ 12,176.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit ("Ex.") 1

MEDIA

D.O.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 300015

DATE Febrero 8, 1980.

CLIENT COmite Kennedy Presidente

JOB Produccion y Publicacion Anuncio Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Arte, Tipografia, mechanical, y publicacion Anuncio en el Mundo y el San Juan Star | | | 1,266.00 |

Ex. 2

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800001

DATE 2-21-80

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Feb. 22 a Feb. 29/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WQBS - 2 - 30" "Show de la Mañana" | | $ 420.00 | |
| WZNT-FM 7 30" "Lunes a Sabado | | $1,624.00 | |
| WIIQ 5 30" "Lunes a Viernes" | | 810.00 | |
| WAPA 2- 30" "Show de la Mañana | | 192.00 | |
| WLUZ 2 30" "Alegre Despertar y Hoy | | 480.00 | |
| WUNO 2- 30" "Ultima Hora" | | 432.00 | |
| WKVM 2 -30" "Show de la Mañana" | | 288.00 | |
| WBMJ - 5 30" "Lunes a Domingo | | 1,400.00 | |
| WZAR 5- 30" "Lunes a Viernes" | | 360.00 | |
| WPRP 5- 30" "Lunes a Domingo | | 240.00 | |
| COSMO - 5- 30" Lunes a Domingo | | 240.00 | |
| WAEL 5- 30" Lunes a Viernes | | 135.00 | |
| WALO - 5-30" Lunes a Viernes | | 150.00 | |
| WMIA - 5 30" Lunes a Domingo | | 116.00 | |
| WCMN 5 30" Lunes a Viernes | | 120.00 | |
| WUPR 5 30" Lunes a Viernes | | 120.00 | |
| WVJP 5 30" Lunes a Viernes | | 120.00 | |
| WNEL 5 30" Lunes a Viernes | | 180.00 | |
| WKAQ 4 30" Radio Reloj - Combo | | 1,579.00 | |
| WMDD 5 30" Lunes a Domingo | | 240.00 | |
| | | | $9,246.00 |

0 2 0 4 0 3 3 1 0 0

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 3

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 280007

DATE 2/22/80

CLIENT Comite Ke-nedy Presidente

JOB Cargos Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| OCHOA RECORDING STUDIOS | | | |
| (1 tape) #29046 | | $ 11.00 | |
| (2 tape) #28992 | | 20.00 | |
| (25 " ) #29137 | | 250.00 | |
| (20 " ) #29165 | | 200.00 | |
| | | | $481.00 |

8204033101

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 4

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800008

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios - televisión - Feb. 27 a Marzo 4, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ-TV | | | |
| 4-30" - Feb. 27 | | | |
| 2-30" - Feb. 28 | | | |
| 2-30" - Feb. 29 | | | |
| 1-30" - Marzo 1 | | | |
| 3-30" - Marzo 2 | | | |
| 3-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | $6,750.00 | |
| WAPA-TV | | | |
| 3-30" - Feb. 27 | | | |
| 4-30" - Feb. 28 | | | |
| 3-30" - Feb. 29 | | | |
| 1-30" - Marzo 2 | | | |
| 2-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | 5,165.00 | |
| RI. WKBM-TV | | | |
| 1-30" - Feb. 28 | | | |
| 1-30" - Feb. 29 | | | |
| 1-30" - marzo 3 | | | |
| 1-30" - Marzo 4 | | 1,000.00 | |
| | | | $12,915.0 |

Ex. 5

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & H[illegible]IE, INC. Concordia 716, Miramar, P.R. [illegible]907 Tel. 724-7260.

# invoice

NO. 2800009

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios Radio - Marzo 3 a Marzo 7, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - Radio<br>4-30" Radio Reloj | | $1,220.00 | $1,220.00 |

0204033103

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 6

LOPITO, ILEANA & [illegible]VIE, INC. Concordia 716, Miramar, P.[illegible]0907 Tel. 724-7280.

# invoice

NO. 380011

DATE

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA RADIO MARZO 12/ MARZO 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ - 32 spots 30ss Radio Reloj | | $3,300.00 | |
| 2. WQBS - 91 " " | | 1,274.00 | |
| 3. WZNT - 77 " " | | 1,582.00 | |
| 4. WQII - 51 " " | | 1,056.00 | |
| 5. WAPA - 24 " " | | 384.00 | |
| 6. WUNO - 32 " " | | 1,152.00 | |
| 7. WKVM - 12 " " | | 288.00 | |
| 8. WBMJ - 40 " " | | 1,400.00 | |
| 9. WFID - 30 " " | | 420.00 | |
| 10. WIAC - 16 " " | | 288.00 | |
| 11. WZAR - 42 " " | | 504.00 | |
| 12. WPRP - 42 " " | | 294.00 | |
| 13. WOYE - 42 " " | | 252.00 | |
| 14. WAEL - 42 " " | | 189.00 | |
| 15. WMDD - 42 " " | | 336.00 | |
| 16. WALO - 42 " " | | 210.00 | |
| 17. WMIA - 42 " " | | 121.80 | |
| 18. WORO - 42 " " | | 417.90 | |
| 19. WCMN - 42 " " | | 168.00 | |
| 20. WUPR - 42 " " | | 168.00 | |
| 21. WVJP - 42 " " | | 168.00 | |
| 22. WNEL - 42 " " | | 252.00 | |
| 23. WPRM - 42 " " | | 504.00 | |
| 24. WXRF - 42 " " | | 252.00 | |
| 25. WHOY - 42 " " | | 168.00 | |
| 26. WXEW - 42 " " | | 126.00 | |
| 27. WENA - 42 " " | | 189.00 | |
| 28. WX100- 45 " " | | 450.00 | |
| 29. WLUZ - 30 " " | | 540.00 | |
| | | | $16,453.70 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 7

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO TELEVISION MARZO 5 A MARZO 11/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV | | | |
| 1-30ss Marzo 5 | | | |
| 2-30ss Marzo 6 | | | |
| 3-30ss " 3 | | | |
| 1-30ss " 8 | | | |
| 2-30ss " 9 | | | |
| 4-30ss " 10 | | | |
| 3-30ss " 11 | | $8,775.00 | |
| II. WAPA - TV | | | |
| 1-30ss Marzo 5 | | | |
| 3-30ss " 6 | | | |
| 2-30ss " 7 | | | |
| 1-30ss " 9 | | | |
| 2-30ss " 10 | | | |
| 2-30ss " 11 | | 4,800.00 | |
| III. WKBM - TV | | | |
| 1-30ss Marzo 2 | | 200.00 | $13,775.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 8

2040331035

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800003

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB PRODUCCION ANUNCIO RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO 30SS - 2 SPOTS | | | |
| LOCUTORES, ESTUDIO, MEZCLA Y SUPERVISION | | 469.72 | |
| 50 CARTRIDGES | | 500.00 | |
| | | | 969.72 |
| OCHOA RECORDING | 29184 | | 46.00 |
| | | | 1,015.72 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 9

0204035316

LOPITO, ILEANA & [redacted], INC. Concordia 716, Miramar, P. [redacted]0907 Tel. 724-7260.

# invoice

NO. 3800004

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS RADIO Y TELEVISION

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV<br>2 30" MARZO 7 y 14 | | 1,000.00 | |
| I. WKAQ - RADIO<br>44 - 30" MARZO 7, 10 y 11 | | 2,248.00 | |
| | | | $3,248.00 |

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I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 10

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 380004-A

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB PRODUCCION - RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO<br>30SS - 2 - SPOTS<br>LOCUTORES, ESTUDIO, MEZCLA, MASTER,<br>DEMO Y SUPERVISION. | | 1,030.25 | |
| 75 CARTRIDGES | | 750.00 | |
| | | | $1,780.25 |

8204033

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 11

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380008

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB TELEVISION MARZO 8 A MARZO 15 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>1 - 30" Marzo 8<br>1 - 30" " 10<br>3 - 30" " 12 | | $2,575.00 | |
| WAPA - TV<br>4 - 30" Marzo 8<br>2 - 30" " 9<br>1 - 30" " 10<br>2 - 30" " 11<br>2 - 30" " 13<br>4 - 30" " 15 | | $6,145.00 | $8,720.00 |

8204037331094

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

[redacted]

Ex. 12

LOPITO, ILEANA & ROWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380009

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TV MARZO 9 A MARZO 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKBM - TV | | | |
| 2-30" Marzo 9 | | | |
| 1-30" " 10 | | | |
| 1-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | $2,800.00 | |
| II. WLUZ - TV | | | |
| 1-30" Marzo 9 | | | |
| 3-30" " 10 | | | |
| 2-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | 2,025.00 | |
| | | | $4,825.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 13

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800010

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA - MARZO 13/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. EL MUNDO<br>MARZO 13 - 14"x5c | | $1,470.00 | |
| II. EL NUEVO DIA<br>MARZO 13, - 14 x 5c | | 1,105.00 | |
| III. SAN JUAN STAR<br>MARZO 13 - 14x6c | | 1,411.20 | |
| IV. EL VOCERO<br>MARZO 13 - 13 5c | | 975.00 | |
| | | | $4,961.20 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 14

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel: 724-7260.

# invoice

NO. 3780013

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 12 AL 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WAPA-TV<br>MARZO 12 - 4 spots 30ss<br>MARZO 13 - 3 spots 30ss<br>MARZO 14 - 4 spots 30ss | | | $3,715.00 |

8204053112

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 15

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380014

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOUS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 2VTR COPIES WLUZ | | 117.65 | |
| 2. ENTREGAS DE CARTRIDGES EN RADIO EMISORAS AREA METROPOLITANA E ISLA | | 100.00 | $217.65 |

8204033113

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 16

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 3800015

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13 AL 3-15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3 - 30 Marzo 12<br>2 - 30 Marzo 13<br>1 - 15 Marzo 15 | | | $2,450.00 |
| WKAQ - TV<br>2 - 30 Marzo 13<br>3 - 30 Marzo 14<br>2 - 30 Marzo 15 | | | 2,800.00 |
| WAPA - TV<br>4 - 30 Marzo 13<br>1 - 30 Marzo 14<br>3 - 30 Marzo 15 | | | 3,440.00 |
| | | | $8,690.00 |

8204031114

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 17

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380016

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - TV<br>2 - 30" Marzo 12<br>4 - 30" Marzo 13<br>3 - 30" Marzo 14<br>1 - 30" Marzo 15 | | | $1,090.00 |
| WKMB - TV<br>1 - 30" Marzo 13 | | | 300.00 |
| WKBM TV<br>2-30" Marzo 12<br>3-20" Marzo 13<br>4-30" Marzo 14<br>4-30" Marzo 15 | | | 3,685.00 |
| | | | $5,075.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 18

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380017

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15-80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WAPA-TV<br><br>7 - 30ss Marzo 12<br>10- 30ss Marzo 13<br>13- 30ss Marzo 14<br>6 - 30ss Marzo 15 | | | $14,095.00 |

0 2 0 4 0 6 3 1 1 6

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 19

LUPIO, ILEANA & [illegible], INC. Concordia #16, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380018

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO - 16 | | $1,365.00 | |
| EL MUNDO<br>14" x 5c MARZO 16 | | 1,470.00 | |
| SAN JUAN STAR<br>13 1/x x 6c MARZO 16 | | 1,411.20 | |
| EL VOCERO<br>13" x 5c MARZO 14 (2)<br>13" x 5c MARZO 15 (2) | | 2,080.00<br>2,080.00 | $8,406.20 |

8204036117

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 20

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800019

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| REPARTIR CARTRIDGES A RADIO EMISORAS DEL AREA METROPOLITANA Y FUERA DEL AREA. | | $100.00 | |
| VIAR COMUNICADOS PRENSA MENSAJERO ESPECIAL. | | 50.00 | $150.00 |

8204 3318

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 21

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380020

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA - RADIO MARATON

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL MUNDO<br>6" x 3c Marzo 14 y 15 | | $612.00 | |
| EL NUEVO DIA<br>6" x 3 c MARZO 14 y 15 | | 612.00 | |
| EL VOCERO<br>6" x 3 c MARZO 14 y 15 | | 540.00 | $1,764.00 |

8204035319

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 22

LOPITO, ILEANA & H[illegible]IE, INC. Concordia 718, Miramar, P.R. [illegible]007 Tel. 724-7260.

# invoice

NO. 380021

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13-y 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| COMITE KENNEDY PRESIDENTE: | | | |
| WAPA - TV | | | |
| 5 - 30 ss Marzo 13 | | | |
| 3 - 30 ss Marzo 14 | | | |
| 1 - 30 ss Marzo 15 | | | $3,000.00 |

0204036312O

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 23

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380022

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA MARZO 15/80 DOBLE VOTO

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO 15 | | | $1,332.50 |
| EL MUNDO<br>14" x 5 c MARZO 15 | | | 1,505.00 |
| | | | $2,837.50 |

8204033121

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 24

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3780023

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 13 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3- 30ss MARZO 13 | | | $1,300.00 |

820403122

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 25

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800024

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Marzo 14 y 16

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ-Radio<br>16 spots - 30ss | | $ 976.00 | |
| 2. WKAQ-FM<br>45 spots - 30ss | | 390.00 | |
| | | | $=1,366.00 |

8204031323

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 26

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800025

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Programa Radial en Cadena - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WABA-Aguadilla | | $ 50.00 | |
| 2. WZAR-Ponce | | 150.00 | |
| 3. WKFE-Yauco | | 80.00 | |
| 4. WNIK-Arecibo | | 40.00 | |
| 5. WKVM-San Juan | | 200.00 | |
| 6. WVJP-Caguas | | 55.00 | |
| 7. WXRF-Guayama | | 96.00 | |
| 8. WEKO-Cabo Rojo | | 70.00 | |
| 9. WEGA-Vega Baja | | 55.00 | |
| 10. WOYE-Mayaguez | | 100.00 | |
| 11. WFBA-San Sebastian | | 60.00 | |
| 12. WMDD-Fajardo | | 100.00 | |
| 13. WLEY-Cayey | | 80.00 | |
| | | | $ 1,136.00 |

8 2 0 4 0 3 3 1 2 4

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 27

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380026

DATE 15 de marzo /80

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - Mayo 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 'El Día | | | |
| 6" x 3 c - marzo 15 | | $ 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 2. El Mundo | | | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 3. El Vocero | | | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| | | | $ 1,764.00 |

0204033125

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 28

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380027

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. El Mundo<br>14" x 11 c - marzo 16 (C.S.) | | $ 2,618.00 | |
| 2. El Mundo<br>14" x 5 c - marzo 16 | | 1,470.00 | |
| 3. El Mundo<br>14" x 5 c - marzo 16 | | 1,190.00 | |
| 4. El Nuevo Día<br>13" x 5 c - marzo 16 | | 1,105.00 | |
| | | | $ 6,383.00 |

820403126

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 29

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# INVOICE

NO. 3800028

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Entrega cartridges área metropolitana e interior de la isla - Jueves 13 y Viernes 14 (entregado por mensajero especial después de las 7:00 pm.) | | $250.00 | $250.00 |

0 2 0 4 0 3 3 1 2 7

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 30

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800029

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 3 spots Radio - marzo 12/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutores, estudio, mezcla cartridges, supervisión. | | $ 1,159.17 | $ 1,159.17 |

0 2 0 4 0 3 3 1 2 8

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

[redacted]

Ex. 31

# invoice

NO. 380030

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 2 spots radio

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutor, estudio, mezcla cartridges, supervisión. | | $ 594.86 | $ 594.86 |

8204033129

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 32

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800031

DATE 17 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Programa de(1/2)media hora<br>6:30 a 7:00 pm.<br>Mensaje Rafael Hernández Colón<br>sobre las Primarias y Robert<br>Kennedy, Jr. | | $ 2,000.00 | $2,000.00 |

8204033130

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 33

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800032

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Grabación - Programa Hernández Colón /Kennedy

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - Grabación VTR para usarse en programa 30 minutos en WAPA. | | $1,000.00 | $1,000.00 |

8240331331

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 34

LOPITO, ILEANA & HOWE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800033

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Mensaje Hernández Colón - WAPA - TV -

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ-TV - 2 horas adicionales de edición y 1/2 hora grabación mensaje Rafael Hernández Colón marzo 14, 1980 | | 426.48 | $426.48 |

6204033132

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 35

LOPITO, ILEANA & HOWE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380003

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 5 spots - 30ss

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción 5 spots radio 30ss, locutores, estudio, mezcla, supervisión y 24 cartridges. | | 1,379.00 | $1,379.00 |

0204033133

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 36

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800035

DATE 3-17-80

CLIENT Comité Kennedy Presidente

JOB Producción serie de anuncio para prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción serie de anuncios para la prensa y fotograbados. | | | $5,170.60 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 37

0204033

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| We certify that this amount is correct and has been paid in full. | | | |

0240331

(Julio Morales)

I certify that this invoice is correct and ▬ payment has been made. It will be due at its presentation.

Ex. 38

SWORN STATEMENT

I, Julio Héctor Morales, of legal age, married, Administrative Officer of an advertising agency and resident of San Juan, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above mentioned.

2. That I am employed in Lopito, Ileana & Howie, an advertising agency, doing business in San Juan, Puerto Rico.

3. That this agency performed part of the advertising for the Kennedy campaign in Puerto Rico.

4. That we received $168,962.33 of which $88,230.33 were paid in cash for the Kennedy Campaign media expenses.

5. That the Kennedy Campaign in Puerto Rico has completed their debts with our agency.

In San Juan, Puerto Rico, 17 of April, 1980.

Julio Hector Morales

AFFIDDAVIT NO. 2121

Suscribed and sworn to before me by Julio Héctor Morales of the personal circumstances above mentioned.

In San Juan, Puerto Rico, 17 of April, 1980.

LUIS FRANCISCO HERNANDEZ VELEZ

Luis Francisco Hernández Vélez
Notary Public

Exhibit 39

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 17, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Sawyer
DHS Films, Inc.
60 West 55th Street
New York, NY 10019

RE: Matter Under Review (MUR) 1370

Dear Mr. Sawyer:

Enclosed is a subpoena to produce certain documents and materials and to answer written questions issued by the Federal Election Commission ("Commission") to DHS Films, Inc., in connection with the above-referenced matter under review.

The subpoena requires that production of specified documents be made, and that responses to the interrogatories be propounded, to the Commission within fifteen (15) days of your receipt of the enclosed subpoena, by sending them certified mail to the address noted in the subpoena.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits any person from making public the fact of "any notification of investigation" by the Commission unless the respondent instructs the Commission, in writing, to make the investigation public. No such written permission has been received in this matter.

If you have any questions, contact Marsha Gentner, the attorney handling this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

2040331337

Enclosure
Subpoena

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND TO ANSWER WRITTEN QUESTIONS

TO: David Sawyer
DHS Films, Inc.
60 West 55th Street
New York, NY 10019

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), DHS Films, Inc. is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession, custody, or control of DHS Films, Inc. or of any of its directors, officers, agents, or employees. Production is to be made by sending the documents, certified mail, to the Office of General Counsel of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C., within fifteen (15) days of receipt of this subpoena. In addition, DHS Films, Inc. is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission at the address above, also within fifteen (15) days of receipt of this subpoena.

6204033139

DEFINITIONS AND INSTRUCTIONS

As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings or printed materials of any kind, including but not limited to correspondence, memoranda, reports, transcripts, minutes, notes, letters, lists,

telexes, telegrams, messages(including reports, notes, memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, computer print-outs, invoices, account statements, billing forms, receipts, checks and other negotiable paper, records, and compilations in the possession, custody or control of the DHS Films, Inc., its directors, officers, agents, and employees. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials".

2. "DHS Films, Inc.," shall mean the corporation to whom this subpoena is directed, and its directors, officers, employees, and agents.

3. "Kennedy for President Committee" or "KFP" shall mean the principal campaign committee authorized by Senator Edward Kennedy to make expenditures and receive contributions on behalf of his campaign for the 1980 Democratic nomination for the Office of President, and its affiliated committee, Kennedy for President Committee/Puerto Rico, as well as the officers, employees, staff, agents, and volunteers of any of the aforementioned political committees.

4. "Identify" with respect to a person shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the committee or group in question, and the dates of such service.

5. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this subpoena any documents and responses which may be construed to be out of their scope.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information.

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;

8204033140

(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please respond to the following interrogatories:

1. Provide in detail the terms and conditions under which DHS Films, Inc. rendered services to KFP during the period of January 1, 1979 to December 31, 1980, and identify the person(s) who negotiated these terms and conditions on behalf of DHS Films, Inc., and KFP. Your response to this interrogatory should also specify the terms and conditions of any agreement for the extension of credit by DHS Films, Inc. to KFP, including the duration of any such extension of credit, and the circumstances under which the extension of credit would be granted.

(a) Indicate whether any of the above terms and conditions were set forth by virtue of an oral agreement, or if contained in a written contract or some other written memorialization; and provide the date of such oral or written agreement.

2. For each of Exhibits 1 through 2, attached hereto, provide the following information:

0204033141

a) identify the person who prepared the document;

b) the date it was sent to KFP;

c) the date payment by KFP of the amount indicated on the document was due;

d) the date when payment of the amount due was received from KFP, and if such payment was made in installments or increments rather than a lump sum, provide the date and amount of each installment or increment;

e) for each payment listed in response to part d) of this interrogatory, indicate the form (i.e. cash, bank check, KFP check, money order, etc.) in which payment was made.

3. Attached as Exhibits 3 and 4 are copies of four checks made to the order of David Sawyer. For each of these checks, provide the following:

a) whether the check was received by DHS Films, Inc. for services rendered or to be rendered to KFP;

b) if the answer to part a), above, is in the affirmative, the date the check was received;

c) identify the person(s) who transferred the check to DHS, Inc., or if that person is David Sawyer, identify the person who presented the check to David Sawyer;

d) describe the services provided or to be provided for which payment of the check was made by KFP, and the date(s) those services were actually rendered.

620403142

Produce the following in their entirety:

A. All documents and materials which contain, concern, or in any way refer to the terms and conditions under which DHS Film, Inc. provided services to KFP.

B. All documents and materials which record, refer to, or otherwise indicate the receipt of a payment from KFP to DHS Films, Inc., for services rendered or to be rendered.

C. All invoices, bills, or other statements of account concerning services provided or to be provided by DHS Films, Inc. to KFP.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this 13th day of July 1981.

0204033143

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

DHS FILMS, INC. 60 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

2/27/80

Miguel Lausel
Comite pro Kennedy
Avenida Roosevelt
244 Hato Rey
Puerto Rico 00918

Invoice # 985

Production of Two Radio and Two Television Spots

| | | |
|---|---|---|
| Cameraman | @ $500.00 p.d. | $ 1,500.00 |
| Assistant Cameraman | @ 190.00 p.d. | 490.00 |
| Rawstock & Labs | | 1,322.70 |
| Equipment | | 700.50 |
| Travel & Subsistence - including Mascoretta & Sawyer | | 3,744.20 |
| Narration Recording and Dupes | | 300.00 |
| Sprint Telephone & Messengers | | 300.00 |
| Editing | | 2,475.00 |
| Finishing | | 283.00 |
| Art Work | | 250.00 |
| Video Transfer & Assembly | | 2,260.00 |
| Video Dupes | | 140.00 |
| Stock Footage | | 1,200.00 |
| Narrator | | 600.00 |
| Production Manager | | 750.00 |
| David Sawyer | | 2,400.00 |
| Insurance | | 856.00 |
| | Sub Total | 19,571.40 |
| | 15% Overhead | 2,935.71 |
| | Total | $ 22,507.11 |

0204053144

Exhibit I

DHS FILMS, INC. 60 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

2/27/80

Miguel Lausel
Comite pro Kennedy
Ave. Roosevelt
244 Hato Rey
Puerto Rico 00918

Invoice # 986

Jeddu Mascoretto as line producer and director-writer of the Radio and TV spots - Kennedy Single and Tradition.....$3,500.00

0204033145

Exhibit 2

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

1-631
260

90040183

58-12-1

MARCH 12,1980. $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B. P. P. R. POPULAR CENTER 3000 DOLS 00 CTS DOLLARS

OVER $500 TWO SIGNATURES REQUIRED

Alan A. Cohen 10 31
AUTHORIZED SIGNATURE

Mercedes Chaparro Lugo
COUNTERSIGNATURE 4-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040183⑈ ⑆0260-0881⑆ 90-9000 3-0⑈

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

1-631
260

90040186

58-12-1

MARCH 19,1980. $**2,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B. P. P. R. POPULAR CENTER 2000 DOLS 00 CTS DOLLARS

OVER $500 TWO SIGNATURES REQUIRED

Alan A. Cohen 10-31
AUTHORIZED SIGNATURE

Mercedes Chaparro Lugo
COUNTERSIGNATURE 4-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040186⑈ ⑆0260-0881⑆ 90-9000 3-0⑈

0 2 0 4 0 3 3 3 1 4 6

Exhibit 3

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040184

58-12-1

MARCH 19,1980. $**3,000.00**

PAY TO THE ORDER OF DAVID SAWYER

B.P.P.R. POPULAR CENTER 3000 DOLS 00 CTS DOLLARS

OVER $300.00 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040184⑈ ⑆021260088⑆ 90-9000 3-0⑈

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

1-231
260

90040185

58-12-1

MARCH 19,1980. $**3,000.00**

PAY TO THE ORDER OF DAVID SAWYER

B.P.P.R. POPULAR CENTER 3000 DOLS 00 CTS DOLLARS

OVER $300.00 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040185⑈ ⑆021260088⑆ 90-9000 3-0⑈

Exhibit 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: JULY 16, 1981

SUBJECT: SUBPOENAS REGARDING MUR 1370

The attached subpoena which was Commission approved by a vote of 6-0 has been signed and sealed this date.

Attachment:
Subpoena

8204033148

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: JULY 15, 1981

SUBJECT: SUBPOENAS REGARDING MUR 1370

The attached subpoenas which were Commission approved by a vote of 6-0 have been signed and sealed this date.

Attachment:
Subpoenas

8204033149

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
) MUR 1370
Kennedy for President Committee )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 10, 1981 the Commission authorized by a vote of 6-0 issuance of the subpoenas, as submitted with the General Counsel's Memorandum dated July 8, 1981, to the Kennedy for President Committee; Lopito, Ileana and Howie, Inc.; and Orealis Orama.

Attest:

7/10/81
Date

Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 7-8-81, 11:13.
Circulated on 48 hour vote basis: 7-8-81, 4:00

0204033150

8204033151

SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 8, 1981

**MEMORANDUM**

TO: The Commission

FROM: Charles N. Steele
General Counsel

SUBJECT: Request for Authorization to Issue Subpoenas to Produce Documents and to Answer Written Questions in MUR 1370

81 JUL 8 AM: 10

RECEIVED
BY THE
COMMISSION SECRETARY

8204033152

Attached are four subpoenas, three of which seek the production of documents and answers to written questions, and one which contains interrogatories only. The General Counsel's Office requests that the Commission authorize and issue the attached subpoenas in connection with its investigation in MUR 1370. The Commission has found in MUR 1370 that there is reason to believe the Kennedy for President Committee ("KFP"), through its Puerto Rican affiliate, violated the Federal Election Campaign Act of 1971, as amended, by its activities in connection with a fund raising event (a radio "marathon") where a large amount of cash was collected and subsequently paid to a committee vendors.

The Commission has already subpoenaed KFP documents and Puerto Rican bank records, and has propounded interrogatories to the committee which have been responded to by KFP. In addition, the depositions of two staff members of the KFP Puerto Rican affiliate and that of an employee of Lopito, Illeana and Howie, Inc., the vendor to whom a large cash payment was made, were also taken. However, these

depositions, particularly the latter, 1/ raised some further factual questions about the events being investigated, and the attached subpoenas attempt to secure answers to these questions through the responses to the interrogatories propounded therein. Also, the subpoenas seek materials which will serve to verify (or, perhaps not verify) the factual accounts of the events in question, as presented by the aforementioned witnesses in their depositions. 2/ Therefore, the Office of General Counsel recommends the Commission authorize and issue the four subpoenas attached to this memorandum.

Recommendation

Authorize and issue the attached subpoenas to the Kennedy for President Committee, Lopito, Ileana and Howie, Inc., DHS Films, Inc., and Orealis Orama.

Attachments
I. Four subpoenas and cover letters
II. Commission authorization to issue subpoenas

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1/ The testimony given by Julio Hector Morales, of Lopita, Ileana and Howie, Inc., seemed confused, and was internally inconsistent as well as inconsistent with other testimony given. Thus, one of the attached subpoenas is directed to Lopita, Ileana and Howie, Inc., in an attempt to obtain a coherant account of the events in question from the perspective of the alleged vendor-recipient of the KFP cash payment. See Attachment I. Mr. Morales also indicated that Ms. Orealis Orama of his firm witnessed the KFP cash payment to Lopito, Ileana and Howie, Inc., thus the basis for the request to subpoena her to receive answers to written questions concerning that cash payment. Id.

2/ For instance, one subpoena is directed to DHS Films, Inc., a recipient of four bank checks purportedly comprised of cash raised by KFP in the radio marathon. The interrogatories and document requests contained in the subpoena seek from the corporation its account of the events in question as they concern DHS Films, Inc. This further inquiry will serve to assure that the Commission has all the facts with respect to the disposition of the cash raised in the marathon.

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND TO ANSWER WRITTEN QUESTIONS

TO: Kennedy for President Committee
P. O. Box 3743
Washington, D.C. 20007

RE: MUR 1370

At the instance of the Federal Election Commission pursuant to 2 U.S.C. § 437d(a)(1) and (3), the Kennedy for President Committee is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the Kennedy for President Committee, the Kennedy for President Committee/ Puerto Rico, or of any of the officers, agents, staff members, volunteers or employees of these two committees. Production is to be made at the Office of General Counsel of the Federal Election Comission, 1325 K Street, N.W., Washington, D.C., on , 1981, at 10:00 a.m. In addition, the Kennedy for President Committee is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of thie subpoena.

9204033154

DEFINITIONS AND INSTRUCTIONS

Unless otherwise noted, as used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings of any kind, of printed, audio, visual, or electronic

Attachment I (4 subpoenas and cover letters)
(7 pages + 17 Exhibits) Subpoena to KFP + cover letter

materials, including but not limited to correspondence, memoranda, reports, transcripts, minutes, pamphlets, leaflets, notes, letters, lists, telexes, telegrams, messages (including reports, notes, memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, agendas, articles, visual aides, computer print-outs, invoices, account statements, billing forms, receipts, checks and other negotiable paper, solicitation materials, records and compilations which are in the possession, custody or control of the Kennedy for President Committee and the Kennedy for President Committee/Puerto Rico. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials".

2. "Kennedy for President Committee" or "KFP" shall mean the principal campaign committee to whom this subpoena is addressed, and its past and present officers, agents, employees, staff and volunteers.

3. "Kennedy for President Committee/Puerto Rico" or "KFP/PR" shall mean the KFP affiliate committee authorized by Senator Kennedy to receive contributions and make expenditures on his behalf with respect to the Senator's campaign for the 1980 Democratic nomination for the office of President, and the committee's past and present officers, agents, employees, staff and volunteers.

4. "Identify" with respect to a person shall mean to give the full name, last known residence address of such individual, the last known place of business where such inidividual is or was employed, the title of the job or position held with the committee or group in question, and the dates of such service.

5. "Identify" with respect to a document shall mean the title, if any, the type of communication (for e.g. letter, memorandum, telegram, etc.), the person to whom it is addressed and the person who signed it (if applicable), the date, and a brief description of its content.

6. "Identify" with respect to a disclosure report filed with the Federal Election Commission shall mean the title of the report, the FEC form number, and the date the report was filed with the Commission.

0 2 0 4 0 3 3 1 5 5

7. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this subpoena any documents and responses which may be construed to be out of their scope.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information.

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please respond to the following interrogatories:

1. Did KFP give any instructions to KFP/PR, or designate any procedures to be followed, with respect to the collection, reporting and processing of, and recordkeeping for, contributions received by KFP/PR.

a) If so, what were these instuctions or designations, in what form (i.e. by letter, memorandum, orally, etc.) were they communicated to KFP/PR, and when were they so communicated.

2. When did KFP first learn that an account ( had been opened by KFP/PR at Banco de Santander, Puerto Rico? (See Letter of W. C. Oldaker to Charles N. Steele dated December 2, 1980.)

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a) Identify the person or document from whom KFP obtained this information.

3. For each deposit listed below, provide the date when KFP learned that a deposit in that amount had been made by KFP/PR into its account at Banco de Santander. (See Letter of W. C. Oldaker to Charles N. Steele dated December 2, 1980.)

| Deposit Amount | Date of Deposit |
|---|---|
| $4,000 | 2/26/80 |
| 2,000 | 2/28/80 |
| 20 | 3/19/80 |
| 6,325 | 4/11/80 |
| 365 | 6/13/80 |

4. Records submitted by KFP indicate that the deposit of $6,325 made on April 11, 1980 (referred to in Interrogatory 3, above) was comprised of, inter alia, contributions which exceeded $200. Identify the KFP report filed with the Federal Election Commission in which the identity (as that term is used in 2 U.S.C. §§ 431(13) and 434(b)) of the individuals who made these contributions was disclosed.

5. In KFP's response to Commission interrogatories of February 25, 1981, it is stated in response to Request E (at page 2 of KFP's response) that the information subpoenaed would be provided to the Commission "when available". Please provide that information in response to this subpoena or indicate its unavailability and the reason(s) for that unavailability.

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6. Provide the date, if any, that KFP/PR account #008-3511 at Banco de Santander, Puerto Rico was closed, and the balance of the account on that date.

a) If the balance of KFP/PR account exceeded $0 when the account was closed, identify the transferee/recipient of those funds.

7. Did KFP give prior approval of, authorize, request, or suggest that KFP/PR undertake and sponsor the "radio marathon" it held in March, 1980, in Puerto Rico?

8. If the answer to Interrogatory 7, above, is in the negative, provide the date KFP learned of the aforementioned "radio marathon", and identify the person(s) or document(s) which were the source of this knowledge.

9. Identify the person(s) or document(s) which were the source from whom KFP learned that approximately $99,000 was received by KFP/PR from its "radio marathon", and the date that information was first communicated to KFP. (See letter of W. C. Oldaker to Charles N. Steele, dated December 2, 1980).

10. Attached are Exhibits 1 to 7. Identify the individual who wrote in the additional entries contained on each of these documents (i.e. the person who wrote the entries that are written in hand as oppposed to type print), and the date these entries were made.

11. When did KFP first learn that a payment of approximately $88,000, in cash, had been made by KFP/PR to Lopito, Ileana, and Howie, Inc., of Puerto Rico? Identify the source of the aforementioned information obtained by KFP.

0204033158

12. Identify the person(s) who prepared each of Exhibits 8 through 15, attached hereto, and the person(s) and documents which were the source(s) from whom the information was obtained which was used to prepare Exhibits 8 through 15.

13. Identify the person who obtained the checks, copies of which are contained on Exhibits 16 through 17, attached hereto.

Please provide the following in their entirety:

A. Copies of any documents and materials sent by KFP to KFP/PR that describe, designate, deal with, or otherwise refer to any procedures to be followed by KFP/PR in making expenditures and in receiving contributions.

B. Mr. Miguel A. Rivera, a volunteer of KFP/PR, has provided sworn testimony stating that he obtained a receipt for an $88,000 cash payment made by him on behalf of KFP/PR to Lopito, Ileana and Howie, Inc. of Puerto Rico, and that he gave this receipt to KFP/PR. Please provide that receipt.

C. All documents and materials from which information was obtained which was used to prepare Exhibits 8 through 15. If these documents have already been provided to the Commission, please identify them.

D. All documents containing a record (as required by 2 U.S.C. § 432(c)(2)) of the name and address of each person

2040331359

who made a contribution to KFP/PR in excess of $50. (Supporting materials accompanying the W. C. Oldaker letter of December 2, 1980 to Charles N. Steele, and the KFP response to Commission interrogatories indicate that at least two bank account deposits made by KFP/PR, one for $6,325 and one for $365, were comprised, inter alia, of contributions in excess of $50.)

WHEREFORE, the of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this day of 1981.

ATTEST:

Marjorie E. Emmons
Secretary to the Commission

0204033160

LOPITO, ILEANA & HOWE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# INVOICE

NO. 3800001

DATE: March 17, 1980

CLIENT: Kennedy For President - Committee

JOB: Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | Ck #12 | (5,000.00) |
| | | Ck #17 | (1,266.00) |
| | | Ck #18 | (12,176.00) |
| | | | 150,520.33 |
| | | Ck #24 | (23,790.00) |
| | | | 126,730.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 1

LOPITO, ILEANA & HO[illegible]E, INC. Concordia 716, Miramar, P.R. [illegible]07 Tel. 724-7200.

# INVOICE

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # [illegible] | 5 000.00 |
| | | # 17 | 1 266.00 |
| | | # 111 | 12, 176,00 |
| | | # 2H | 23,746.00 |
| | | # 5 H | 10, 000.00 |
| | | | 116, 730.33 |
| | | ck # 5A | 12, 000.00 |
| | | | 104, 730.33 |
| We certify that this amount is correct and has been paid in full. | | ck # 4A | 4,000.00 |
| | | | 100, 730 33 |

(Julie Hordes)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 2

LOPITO, ILEANA & HOWE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260

# INVOICE

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | | ck # 12 | (5000.00) |
| | | cl # 17 | (1266.00) |
| | | ck # 1A | (12 172.00) |
| | | cl # 2A | (23,790.00) |
| | | ck # 5A | (10,000.00) |
| | | | 116,730.33 |
| | | ck 6A | (4 000.00) |
| We certify that this amount is correct and has been paid in full. | | | 112,730.33 |

(Julio Iglesias)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 3

LOPITO, ILEANA & HO[illegible]E, INC. Concordia 716, Miramar, P.R. [illegible]07 Tel. 724-7260.

# INVOICE

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5 000.00) |
| | | ck # 17 | (1,266,00) |
| | | ck # 111 | (12,176.00) |
| | | ck # 211 | (23,790.00) |
| | | | 126,730.33 |
| | | ck # 311 | (10,000.00) |
| We certify that this amount is correct and has been paid in full. | | | 116,730.33 |

(Julio Herdos)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 4

LOPITO, ILEANA & H[illegible]E, INC. Concordia 716, Miramar, P.R. [illegible]007 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5 000.00) |
| | | ck # 11 | (1 266.00) |
| | | | 162,696.33 |
| | | ck # 14 | (12,176.00) |
| | | Balance | 150,520.33 |

We certify that this amount is correct and has been paid in full.

(Julio Herdez)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 5

0 2 0 3 3 1 6

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# INVOICE

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payment | ck # 12 | -( 5 000.00 ) |
| | | | 163,962.33 |
| | | ck # 17 | ( 1 266.00 ) |
| | | balance | 162,696.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be given at its presentation.

Exhibit 6

3 1 6 0 4 0 2 0

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# INVOICE

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 163,962.33 |
| | | Payment cl # 12 | (5 000.00) |
| | | Balance | 163,962.33 |

We certify that this amount is correct and has been paid in full.

(Julio Hurtado)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit 7

# Kennedy for President Committee

CHECK REQUEST — VENDOR PAYMENT

☐ VENDOR BILL ATTACHED

☐ VENDOR BILL TO FOLLOW

DATE 6/1/60

VENDOR NAME: Lyric Opera House, Inc.

VENDOR ADDRESS: Omaha 116

CITY, STATE, ZIP: Miami, Fla.

AMOUNT DUE: 12,500.00

STATE (in which services are rendered)

PARTICULARS (Include dates and events) Payment on Invoice

see attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 16A

DATE: 3-12-60

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

Exhibit 8

Total 165, 962.33

Payments:

| | | |
|---|---|---|
| Ck # 12) | 5, | 000.00 |
| 17) | 1, | 266.00 |
| 1H) | 12, | 176.00 |
| 2H) | 23, | 790.00 |
| 5H) | 10, | 000.00 |
| 6H) | 4, | 000.00 |
| 9H) | 12 | 000.00 |
| 16A) | 12, | 500.00 |

88, 230.33 Balance
yield on
each

0 4 0 3 3 1 6 9

# Kennedy for President Committee

**CHECK REQUEST** — **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED

☐ VENDOR BILL TO FOLLOW

DATE ..... 5/4/80 .....

VENDOR NAME: ..... Lytle, Tilyard & Keene, Inc. .....

VENDOR ADDRESS: ..... Courthouse 7th .....

.....

CITY, STATE, ZIP: ..... Miami, FL 33130 .....

AMOUNT DUE: ..... $22,780.00 .....

STATE (in which services are rendered) .....

PARTICULARS (include dates and events) ..... Payment re balance .....

..... See attached .....

.....

BUDGET CHARGED: .....

APPROVAL: .....

SPECIAL HANDLING: .....

---

APPROVAL: .....

NOTES: .....

CHECK NUMBER: ..... 2A .....

DATE: ..... 2-20-80 .....

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 9

C 0 2 0 4 0 5 0 3 1 7 0

# Kennedy for President Committee

CHECK REQUEST — VENDOR PAYMENT

☐ VENDOR BILL ATTACHED

☐ VENDOR BILL TO FOLLOW

DATE 5-1-80

VENDOR NAME: Loyola Llana Y. Hevia, etc.

VENDOR ADDRESS: Cervantes 716

CITY, STATE, ZIP: Miramar, P.R. 00907

AMOUNT DUE: $12000.00

STATE (in which services are rendered):

PARTICULARS (include dates and events) Payment on balance due as stated

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 5 F

DATE: 3-7-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

Exhibit 10

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 5/1/80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Legal Research Assoc, Inc

VENDOR ADDRESS: Columbia 716

CITY, STATE, ZIP: Mineola, NY 11501

AMOUNT DUE: $10,000.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment re Salinger Research

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 517

DATE: 5-28-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 11

2 0 4 0 5 3 1 7 2

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 3/1/80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Lopata, Alexander & Novie Inc

VENDOR ADDRESS: Carnation 716

CITY, STATE, ZIP: Wayne, Pa. 19087

AMOUNT DUE: $12,176.00

STATE (In which services are rendered)

PARTICULARS (include dates and events) Payment on balance See attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 1A

DATE: 2-20-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

Exhibit 12

20403173

# Kennedy for President Committee

**CHECK REQUEST** — **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED

☐ VENDOR BILL TO FOLLOW

DATE ..... 5/1/60 .....

VENDOR NAME: ..... Ingalls, Wood & Mann, Inc. .....

VENDOR ADDRESS: ..... Commerce Bldg. .....

.....

CITY, STATE, ZIP: ..... Memphis, Tenn. 38103 .....

AMOUNT DUE: ..... $1266.00 .....

STATE (in which services are rendered) .....

PARTICULARS (include dates and events) ..... Payment re Travel .....

..... see attached .....

.....

BUDGET CHARGED: .....

APPROVAL: .....

SPECIAL HANDLING: .....

APPROVAL: .....

NOTES: .....

CHECK NUMBER: ..... 17 .....

DATE: .....

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

Exhibit 13

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 5-1-80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Lopata, Hogan and Harris

VENDOR ADDRESS: Cherrydale # 716

CITY, STATE, ZIP: Memphis, TN 38120

AMOUNT DUE: $5,000.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on $168,962.33 (See attached)

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 12-

DATE: 1-24-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

Exhibit 14

C 2040531753 (12)

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 3/1/60

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Capitol Limousine Service

VENDOR ADDRESS: Lancaster, PA

CITY, STATE, ZIP: Lancaster, PA 17603

AMOUNT DUE: $41.00.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on transfer (see attached)

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 64

DATE: 3-1-60

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

Exhibit 15

Exhibit 16

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040183

58-12-1

MARCH 12 1980 $3,000.00

PAY TO THE ORDER OF DAVID SAWER

B. P. P. R. POP. LA CONTE 3000 DOLS 00 CTS DOLLARS

TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040183⑈ ⑆026000886⑆ 90-90003-0⑈

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040186

58-12-1

MARCH 12 1980 $2,000.00

PAY TO THE ORDER OF DAVID SAWER

B. P. P. R. POP. LA CONTE 2000 DOLS 00 CTS DOLLARS

TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040186⑈ ⑆026000886⑆ 90-90003-0⑈

8 2 0 4 0 3 3 3 1 7 7

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040184

53-12-1

MARCH 19,1930. $ **3,000.00**

PAY TO THE ORDER OF ----------DAVID SAINER----------

POPULAR CODE 3000 DOLLARS 00 CTS

DOLLARS

OVER $500 OF THIS AMOUNT IS RECORDED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040184⑈ ⑆021500088⑆ 90-9000 3-0⑈

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040185

58-12-1

MARCH 19,1930. $ **3,000.00**

PAY TO THE ORDER OF ----------DAVID SAINER----------

POPULAR CODE 3000 DOLLARS 00 CTS

DOLLARS

OVER $500 OF THIS AMOUNT IS RECORDED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈ 2 0 4 0 3 3 3 1 7 8 ⑈

⑈90040185⑈ ⑆021500088⑆ 90-9000 3-0⑈

Exhibit 17

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Oldaker, Esquire
Graham and James
1050 17th Street, N.W.
12th Floor
Washington, D.C. 20036

RE: Matter Under Review (MUR) 1370

Dear Mr. Oldaker:

Enclosed is a subpoena to produce certain documents and materials and order to anwswer written questions issued by the Federal Election Commission ("Commission") to the Kennedy for President Committee.

The subpoena requires that production of specified documents be made at the time and place stated therein and that responses to the interrogatories be propounded to the Commission within ten (10) days of your receipt of the enclosed order.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY; Kenneth A. Gross
Associate General Counsel

Enclosures: Subpoena

cc: Kennedy for President Committee
P. O. Box 3743
Washington, D.C. 20007

Attachment I
(cover letter)

8204033179

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND TO ANSWER WRITTEN QUESTIONS

TO: Efrain Lopez, Jorge L. de Jesus,
Ileana Fort, Directors
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: MUR 1370

2040331801

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), Lopito, Ileana and Howie, Inc., is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possesion or control of Lopita, Ileana and Howie, Inc. or of any of its directors, officers, agents, or employees. Production is to be made by sending the documents, certified mail, to the Office of General Counsel of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C., within fifteen (15) days of receipt of this subpoena. In addition, Lopito, Ileana and Howie, Inc. is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission at the address of above, also within fifteen (15) days of receipt of this subpoena.

DEFINITIONS AND INSTRUCTIONS

As used in this subpoena, the terms listed below are defined as follows:

Attachment I (continued)
Subpoena to Lopito
(7 pages + 39 Exhibits)
+ cover letter

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings or printed materials of any kind, including but not limited to correspondence, memoranda, reports, transcripts, minutes, notes, letters, lists, telexes, telegrams, messages (including reports, notes memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, computer print-outs, invoices, account statements, billing forms, receipts, checks and other negotiable paper, records and compilations in the possession, custody or control of Lopito, Ileana, and Howie, Inc., or its directors, officers, agents and employees. Designatated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials".

2. "Lopito, Ileana, and Howie, Inc.," shall mean the corporation to whom this subpoena is directed, and its directors, officers, employees and agents.

3. "Kennedy for President Committee/Puerto Rico" or "KFP/PR" shall mean the political committee located in Puerto Rico which was authorized by Senator Edward Kennedy to make expenditures and receive contributions on behalf of his campaign for the 1980 Democratic nomination for the Office of President, and the committee's officers, employees, staff, agents, and volunteers.

4. "Identify" with respect to a person shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the committee or group in question, and the dates of such service.

5. "KFP/PR account" shall mean the relationship between Lopito, Ileana, and Howie, Inc., and KFP/PR by virtue of which the corporation provided media, production, consulting, campaign, or other services to KFP/PR from the period of January 1, 1979 through December 31, 1980.

6204033381

6. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this subpoena any documents and responses which may otherwise be construed to be out of their scope.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information.

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please respond to the following interrogatories:

1. Identify the person(s) in charge of, or who had supervisory responsibility for, the KFP/PR account with Lopito, Ileana, and Howie, Inc.

2. Provide in detail the terms and conditions under which Lopito, Ileana, and Howie, Inc., rendered services to KFP/PR in 1979-1980, and identify the persons who negotiated the terms and conditions on behalf of Lopito, Ileana and Howie, Inc., and KFP/PR. Your response to this interrogatory should also specify the terms and conditions of any agreement for the extension of credit by Lopita, Ileana and Howie, Inc. to KFP/PR, including the duration of any such extension of credit, and the circumstances under which the extension of credit would be provided.

0204033182

a) Indicate whether any of the above terms and conditions were set forth by virtue of an oral agreement, or if contained in a written contract or some other written memorialization, and provide the date of such oral or written agreement.

3. For each of Exhibits 1 to 38, attached hereto, provide the following information:

a) identify the person who prepared the document;

b) the date it was sent to KFP/PR;

c) the date payment by KFP/PR of the amount indicated on the document was due;

d) the date when payment of the amount due was received from KFP/PR, and if such payment was made in installments or increments rather than a lump sum, provide the date and amount of each installment or increment;

e) for each payment listed in response to part d) of this interrogatory, indicate the form (i.e. cash, bank check, KFP/PR check, money order, etc.) in which payment was made.

4. Did Lopito, Ileana, and Howie, Inc. receive any payments in cash or coin from KFP/PR? If your response to this interrogatory is in the affirmative, provide the following information for each such cash payment:

a) the date the payment was made;

b) the amount of cash received;

c) identify the person(s) who tendered the cash to Lopito, Ileana, and Howie, Inc.;

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d) identify the person(s) who received the cash on behalf of Lopito, Ileana, and Howie, Inc.;

e) indicate whether anyone on behalf of KFP/PR notified Lopito, Ileana and Howie, Inc. that KFP/PR would be tendering a cash payment, prior to receipt of that payment by Lopito, Ileana and Howie, Inc., and identify the person who communicated that notification on KFP/PR's behalf, as well as the date of any notification to that effect;

f) indicate whether Lopito, Ileana, and Howie, Inc. provided any receipt or other written memorialization of the cash payment at the time it was received from KFP/PR;

g) the location where the cash was kept while at Lopito, Ileana, and Howie, Inc.;

h) state whether the cash was deposited in a bank account, along with the date of the deposit, or if the cash was not deposited in a bank account, identify the person to whom it was transferred;

i) indicate whether the cash was paid for services already provided at the time of payment or to be rendered at some future date after payment, and if the latter, when such services were actually performed;

6204033184

j) if there existed any formal or informal agreement between KFP/PR and Lopito, Ileana, and Howie, Inc., at the time the cash payment was made that all or any part of the cash received would be put in escrow or otherwise reserved or held as security for payment by check, or to be used for some future (and at that time) undetermined services, provide the terms and conditions of such escrow/reservation, the amount set aside pursuant to that agreement, and identify the person(s) who had custody of the cash in escrow or that was set aside.

5. Describe the duties and responsibilities of your employee Julio Hector Morales, with respect to the KFP/PR account.

6. Was the affidavit of Julio Hector Morales, a copy of which is attached hereto as Exhibit 39, executed on behalf of Lopito, Ileana, and Howie, Inc.? If your answer to this interrogatory is in the affirmative, indentify the person(s) who requested Senior Morales to draw up his affidavit and the reason why that request was made.

Produce the following in their entirety:

A. All documents and materials which contain, concern, or in any way refer to the terms and conditions under which Lopito, Ileana, and Howie, Inc. provided services to KFP/PR during the period of January 1, 1979 through December 31, 1980.

0204033185

B. All documents and materials which record, refer to, or otherwise indicate the receipt of a payment from KFP/PR to Lopito, Ileana, and Howie, Inc., for services rendered or to be rendered.

C. All invoices, bills, or other statements of account concerning services provided or to be provided by Lopito, Ileana, and Howie, Inc. to KFP/PR.

WHREFORE, the of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this day of 1981.

ATTEST:

Marjorie E. Emmons
Secretary to the Commission

0204033186

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-726[illegible]

# invoice

NO. 2800012

DATE 2-1-80

CLIENT Comite Kennedy Presidente

JOB Producciones y Anuncios - Radio y Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| ALBERTO CARRION JINGLE - KENNEDY | | | $ 5,800.00 |
| OCHOA RECORDING - Cassettes & cartridges 28941, 28985 | | | 736.00 |
| ANUNCIO PRENSA Produccion y Publicacion | | | 353.00 |
| PRODUCCIONES LAYOUT, MECHANICAL COPIES LETTERING , PHOTOSTATS BROCHURE | | | 788.00 |
| ELMENDORF - PRINTING BROCHURE 10,000 OCPIES | | | 3,500.00 |
| CAMPAÑA RADIO FEB 4 A FEB 9 | | | 5,999.00 |
| | | | 17,176.00 |
| Menos pago parcial | | | 5,000.00 |
| Balance de esta factura | | | $ 12,176.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Exhibit ("Ex.") 1

MEDIA

D.O

LOPITO, ILEANA & HOWE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 800015

DATE Febrero 8, 1980.

CLIENT COmite Kennedy Presidente

JOB Produccion y Publicacion Anuncio Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Arte, Tipografia, mechanical, y publicacion Anuncio en el Mundo y el San Juan Star | | | 1,266.00 |

8 2 0 4 0 3 1 8 0

Ex. 2

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

MEDIA

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800001

DATE 2-21-80

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Feb. 22 a Feb. 29/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WQBS - 2 - 30" "Show de la Mañana" | | $ 420.00 | |
| WZNT-FM 7 30" "Lunes a Sabado | | $1,624.00 | |
| WIIQ 5 30" "Lunes a Viernes" | | 810.00 | |
| WAPA 2- 30" "Show de la Mañana | | 192.00 | |
| WLUZ 2 30" "Alegre Despertar y Hoy | | 480.00 | |
| WUNO 2- 30" "Ultima Hora" | | 432.00 | |
| WKVM 2 -30" "Show de la Mañana" | | 288.00 | |
| WBMJ - 5 30" "Lunes a Domingo | | 1,400.00 | |
| WZAR 5- 30" "Lunes a Viernes" | | 360.00 | |
| WPRP 5- 30" "Lunes a Domingo | | 240.00 | |
| COSMO - 5- 30" Lunes a Domingo | | 240.00 | |
| WAEL 5- 30" Lunes a Viernes | | 135.00 | |
| WALO - 5-30" Lunes a Viernes | | 150.00 | |
| WMIA - 5 30" Lunes a Domingo | | 116.00 | |
| WCMN 5 30" Lunes a Viernes | | 120.00 | |
| WUPR 5 30" Lunes a Viernes | | 120.00 | |
| WVJP 5 30" Lunes a Viernes | | 120.00 | |
| WNEL 5 30" Lunes a Viernes | | 180.00 | |
| WKAQ 4 30" Radio Reloj - Combo | | 1,579.00 | |
| WMDD 5 30" Lunes a Domingo | | 240.00 | |
| | | | $9,246.00 |

8204053189

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 3

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 280007

DATE 2/22/80

CLIENT Comite Ke-nedy Presidente

JOB Cargos Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| OCHOA RECORDING STUDIOS | | | |
| (1 tape) #29046 | | $ 11.00 | |
| (2 tape) #28992 | | 20.00 | |
| (25 " ) #29137 | | 250.00 | |
| (20 " ) #29165 | | 200.00 | |
| | | | $481.00 |

8204053190

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 4

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800008

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios - televisión - Feb. 27 a Marzo 4, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ-TV | | | |
| 4-30" - Feb. 27 | | | |
| 2-30" - Feb. 28 | | | |
| 2-30" - Feb. 29 | | | |
| 1-30" - Marzo 1 | | | |
| 3-30" - Marzo 2 | | | |
| 3-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | $6,750.00 | |
| WAPA-TV | | | |
| 3-30" - Feb. 27 | | | |
| 4-30" - Feb. 28 | | | |
| 3-30" - Feb. 29 | | | |
| 1-30" - Marzo 2 | | | |
| 2-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | 5,165.00 | |
| II. WKBM-TV | | | |
| 1-30" - Feb. 28 | | | |
| 1-30" - Feb. 29 | | | |
| 1-30" - marzo 3 | | | |
| 1-30" - Marzo 4 | | 1,000.00 | |
| | | | $12,915.0 |

2040331911

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 5

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800009

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios Radio - Marzo 3 a Marzo 7, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - Radio<br>4-30" Radio Reloj | | $1,220.00 | $1,220.00 |

8204031792

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 6

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380011

DATE

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA RADIO MARZO 12/ MARZO 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ - 32 spots 30ss Radio Reloj | | $3,300.00 | |
| 2. WQBS - 91 " " | | 1,274.00 | |
| 3. WZNT - 77 " " | | 1,582.00 | |
| 4. WQII - 51 " " | | 1,056.00 | |
| 5. WAPA - 24 " " | | 384.00 | |
| 6. WUNO - 32 " " | | 1,152.00 | |
| 7. WKVM - 12 " " | | 288.00 | |
| 8. WBMJ - 40 " " | | 1,400.00 | |
| 9. WFID - 30 " " | | 420.00 | |
| 10. WIAC - 16 " " | | 288.00 | |
| 11. WZAR - 42 " " | | 504.00 | |
| 12. WPRP - 42 " " | | 294.00 | |
| 13. WOYE - 42 " " | | 252.00 | |
| 14. WAEL - 42 " " | | 189.00 | |
| 15. WMDD - 42 " " | | 336.00 | |
| 16. WALO - 42 " " | | 210.00 | |
| 17. WMIA - 42 " " | | 121.80 | |
| 18. WORO - 42 " " | | 417.90 | |
| 19. WCMN - 42 " " | | 168.00 | |
| 20. WUPR - 42 " " | | 168.00 | |
| 21. WVJP - 42 " " | | 168.00 | |
| 22. WNEL - 42 " " | | 252.00 | |
| 23. WPRM - 42 " " | | 504.00 | |
| 24. WXRF - 42 " " | | 252.00 | |
| 25. WHOY - 42 " " | | 168.00 | |
| 26. WXEW - 42 " " | | 126.00 | |
| 27. WENA - 42 " " | | 189.00 | |
| 28. WX100- 45 " " | | 450.00 | |
| 29. WLUZ - 30 " " | | 540.00 | |
| | | | $16,453.70 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 7

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 3800001

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO TELEVISION MARZO 5 A MARZO 11/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV | | | |
| 1-30ss Marzo 5 | | | |
| 2-30ss Marzo 6 | | | |
| 3-30ss " 3 | | | |
| 1-30ss " 8 | | | |
| 2-30ss " 9 | | | |
| 4-30ss " 10 | | | |
| 3-30ss " 11 | | $8,775.00 | |
| II. WAPA - TV | | | |
| 1-30ss Marzo 5 | | | |
| 3-30ss " 6 | | | |
| 2-30ss " 7 | | | |
| 1-30ss " 9 | | | |
| 2-30ss " 10 | | | |
| 2-30ss " 11 | | 4,800.00 | |
| III. WKBM - TV | | | |
| 1-30ss Marzo 2 | | 200.00 | |
| | | | $13,775.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 8

3204033194

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800003

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB PRODUCCION ANUNCIO RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO 30SS - 2 SPOTS | | | |
| EJECUTORES, ESTUDIO, MEZCLA Y SUPERVISION | | 469.72 | |
| 50 CARTRIDGES | | 500.00 | |
| | | | 969.72 |
| OCHOA RECORDING | 29184 | | 46.00 |
| | | | 1,015.72 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 9

9204033195

LOPITO, ILEANA & [redacted]VIE, INC. Concordia 716, Miramar, P.[redacted]0907 Tel. 724-7260.

# invoice

NO. 3800004

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS RADIO Y TELEVISION

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV<br>2 30" MARZO 7 y 14 | | 1,000.00 | |
| I. WKAQ - RADIO<br>44 - 30" MARZO 7, 10 y 11 | | 2,248.00 | |
| | | | $3,248.00 |

0204033196

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

[redacted]

Ex. 10

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380004-A

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB PRODUCCION - RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO<br>30SS - 2 - SPOTS<br>LOCUTORES, ESTUDIO, MEZCLA, MASTER,<br>DEMO Y SUPERVISION. | | 1,030.25 | |
| 75 CARTRIDGES | | 750.00 | |
| | | | $1,780.25 |

0204053

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

[redacted]

Ex. 11

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# INVOICE NO. 380008

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB TELEVISION MARZO 8 A MARZO 15 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>1 - 30" Marzo 8<br>1 - 30" " 10<br>3 - 30" " 12 | | $2,575.00 | |
| WAPA - TV<br>4 - 30" Marzo 8<br>2 - 30" " 9<br>1 - 30" " 10<br>2 - 30" " 11<br>2 - 30" " 13<br>4 - 30" " 15 | | $6,145.00 | $8,720.00 |

6204031988

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 12

LOPITO, ILEANA & [redacted]WIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380009

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TV MARZO 9 A MARZO 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKBM - TV | | | |
| 2-30" Marzo 9 | | | |
| 1-30" " 10 | | | |
| 1-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | $2,800.00 | |
| II. WLUZ - TV | | | |
| 1-30" Marzo 9 | | | |
| 3-30" " 10 | | | |
| 2-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | 2,025.00 | |
| | | | $4,825.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 13

6204033199

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800010

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA - MARZO 13/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. EL MUNDO<br>MARZO 13 - 14"x5c | | $1,470.00 | |
| II. EL NUEVO DIA<br>MARZO 13, - 14 x 5c | | 1,105.00 | |
| III. SAN JUAN STAR<br>MARZO 13 - 14x6c | | 1,411.20 | |
| IV. EL VOCERO<br>MARZO 13 - 13 5c | | 975.00 | |
| | | | $4,961.20 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 14

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 3780013

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 12 AL 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WAPA-TV<br>MARZO 12 - 4 spots 30xx<br>MARZO 13 - 3 spots 30ss<br>MARZO 14 - 4 spots 30ss | | | $3,715.00 |

0204033201

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 15

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380014

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOUS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 2VTR COPIES WLUZ | | 117.65 | |
| 2. ENTREGAS DE CARTRIDGES EN RADIO EMISORAS AREA METROPOLITANA E ISLA | | 100.00 | $217.65 |

0 2 0 4 0 3 3 2 0 2

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 16

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800015

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13 AL 3-15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3 - 30 Marzo 12<br>2 - 30 Marzo 13<br>1 - 15 Marzo 15 | | | $2,450.00 |
| WKAQ - TV<br>2 - 30 Marzo 13<br>3 - 30 Marzo 14<br>2 - 30 Marzo 15 | | | 2,800.00 |
| WAPA - TV<br>4 - 30 Marzo 13<br>1 - 30 Marzo 14<br>3 - 30 Marzo 15 | | | 3,440.00 |
| | | | $8,690.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 17

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380016

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - TV | | | |
| 2 - 30" Marzo 12 | | | |
| 4 - 30" Marzo 13 | | | |
| 3 - 30" Marzo 14 | | | |
| 1 - 30" Marzo 15 | | | $1,090.00 |
| WKMB - TV | | | |
| 1 - 30" Marzo 13 | | | 300.00 |
| WKBM TV | | | |
| 2-30" Marzo 12 | | | |
| 3-20" Marzo 13 | | | |
| 4-30" Marzo 14 | | | |
| 4-30" Marzo 15 | | | 3,685.00 |
| | | | $5,075.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 18

8204032004

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380017

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15-80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WAPA-TV<br><br>7 - 30ss Marzo 12<br>10- 30ss Marzo 13<br>13- 30ss Marzo 14<br>6 - 30ss Marzo 15 | | | $14,095.00 |

0204053205

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 19

LOPITO, ILEANA & HOWE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380018

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO - 16 | | $1,365.00 | |
| EL MUNDO<br>14" x 5c MARZO 16 | | 1,470.00 | |
| SAN JUAN STAR<br>13 1/x x 6c MARZO 16 | | 1,411.20 | |
| EL VOCERO<br>13" x 5c MARZO 14 (2)<br>13" x 5c MARZO 15 (2) | | 2,080.00<br>2,080.00 | $8,406.20 |

8204053206

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 20

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800019

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| REPARTIR CARTRIDGES A RADIO EMISORAS DEL AREA METROPOLITANA Y FUERA DEL AREA. | | $100.00 | |
| VIAR COMUNICADOS PRENSA MENSAJERO ESPECIAL. | | 50.00 | $150.00 |

8204033207

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 21

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# INVOICE NO. 380020

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA - RADIO MARATON

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL MUNDO<br>6" x 3c Marzo 14 y 15 | | $612.00 | |
| EL NUEVO DIA<br>6" x 3 c MARZO 14 y 15 | | 612.00 | |
| EL VOCERO<br>6" x 3 c MARZO 14 y 15 | | 540.00 | $1,764.00 |

8204053208

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 22

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380021

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13-y 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| COMITE KENNEDY PRESIDENTE: | | | |
| WAPA - TV | | | |
| 5 - 30 ss Marzo 13 | | | |
| 3 - 30 ss Marzo 14 | | | |
| 1 - 30 ss Marzo 15 | | | $3,000.00 |

0 2 0 4 0 3 3 2 0

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 23

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380022

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA MARZO 15/80 DOBLE VOTO

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO 15 | | | $1,332.50 |
| EL MUNDO<br>14" x 5 c MARZO 15 | | | 1,505.00 |
| | | | $2,837.50 |

0204033210

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 24

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3780023

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 13 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3- 30ss MARZO 13 | | | $1,300.00 |

8204033211

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 25

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 3800024

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Marzo 14 y 16

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ-Radio<br>16 spots - 30ss | | $ 976.00 | |
| 2. WKAQ-FM<br>45 spots - 30ss | | 390.00 | |
| | | | $=1,366.00 |

0204053212

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 26

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800025

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Programa Radial en Cadena - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WABA-Aguadilla | | $ 50.00 | |
| 2. WZAR-Ponce | | 150.00 | |
| 3. WKFE-Yauco | | 80.00 | |
| 4. WNIK-Arecibo | | 40.00 | |
| 5. WKVM-San Juan | | 200.00 | |
| 6. WVJP-Caguas | | 55.00 | |
| 7. WXRF-Guayama | | 96.00 | |
| 8. WEKO-Cabo Rojo | | 70.00 | |
| 9. WECA-Vega Baja | | 55.00 | |
| 10. WOYE-Mayaguez | | 100.00 | |
| 11. WFBA-San Sebastian | | 60.00 | |
| 12. WMDD-Fajardo | | 100.00 | |
| 13. WLEY-Cayey | | 80.00 | |
| | | | $ 1,136.00 |

0 2 0 4 0 5 3 3 2 1 3

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 27

LOPITO, ILEANA & ROWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# INVOICE NO. 380026

DATE 15 de marzo /80

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - Mayo 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 'El Día | | | |
| 6" x 3 c - marzo 15 | | $ 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 2. El Mundo | | | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 3. El Vocero | | | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| | | | $ 1,764.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 28

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380027

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. El Mundo<br>14" x 11 c - marzo 16 (C.S.) | | $ 2,618.00 | |
| 2. El Mundo<br>14" x 5 c - marzo 16 | | 1,470.00 | |
| 3. El Mundo<br>14" x 5 c - marzo 16 | | 1,190.00 | |
| 4. El Nuevo Día<br>13" x 5 c - marzo 16 | | 1,105.00 | |
| | | | $ 6,383.00 |

8204053215

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 29

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800028

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Entrega cartridges área metropolitana e interior de la isla - Jueves 13 y Viernes 14 (entregado por mensajero especial después de las 7:00 pm.) | | $250.00 | $250.00 |

0 2 0 4 0 5 3 3 2 1 6

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 30

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800029

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 3 spots Radio - marzo 12/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutores, estudio, mezcla cartridges, supervisión. | | $ 1,159.17 | $ 1,159.17 |

6204053217

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 31

LOPITO, ILEANA & HOMME, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-1260.

# invoice

NO. 380030

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 2 spots radio

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutor, estudio, mezcla cartridges, supervisión. | | $ 594.86 | $ 594.86 |

0 2 0 4 0 6 3 3 2 1 8

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 32

LOPITO, ILEANA & H[redacted]E, INC. Concordia 716, Miramar, P.R[redacted]907 Tel. 724-7260.

# invoice

NO. 3800031

DATE 17 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Programa de(1/2)media hora<br>6:30 a 7:00 pm.<br>Mensaje Rafael Hernández Colón<br>sobre las Primarias y Robert<br>Kennedy, Jr. | | $ 2,000.00 | $2,000.00 |

0204033219

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 33

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800032

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Grabación - Programa Hernández Colón /Kennedy

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - Grabación VTR para usarse en programa 30 minutos en WAPA. | | $1,000.00 | $1,000.00 |

0 2 0 4 0 3 3 3 2 2 0

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 34

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800033

| | |
|---|---|
| DATE | 15 de marzo de 1980 |
| CLIENT | Comité Kennedy Presidente |
| JOB | Mensaje Hernández Colón - WAPA - TV |

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ-TV - 2 horas adicionales de edición y 1/2 hora grabación mensaje Rafael Hernández Colón marzo 14, 1980 | | 426.48 | $426.48 |

0 2 0 4 0 5 3 3 2 2 1

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 35

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380003

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 5 spots - 30ss

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción 5 spots radio 30ss, locutores, estudio, mezcla, supervisión y 24 cartridges. | | 1,379.00 | $1,379.00 |

0 2 0 4 0 5 3 3 2 2 2

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 36

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800035

DATE 3-17-80

CLIENT Comité Kennedy Presidente

JOB Producción serie de anuncio para prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción serie de anuncios para la prensa y fotograbados. | | | $5,170.60 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

Ex. 37

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and ➡ payment has been made. It will be due at its presentation.

Ex. 38

8 0 4 0 3 3 3 2 7

SWORN STATEMENT

I, Julio Héctor Morales, of legal age, married, Administrative Officer of an advertising agency and resident of San Juan, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above mentioned.

2. That I am employed in Lopito, Ileana & Howie, an advertising agency, doing business in San Juan, Puerto Rico.

3. That this agency performed part of the advertising for the Kennedy campaign in Puerto Rico.

4. That we received $168,962.33 of which $88,230.33 were paid in cash for the Kennedy Campaign media expenses.

5. That the Kennedy Campaign in Puerto Rico has completed their debts with our agency.

In San Juan, Puerto Rico, 17 of April, 1980.

Julio Hector Morales

AFFIDDAVIT NO. 2121

Suscribed and sworn to before me by Julio Héctor Morales of the personal circumstances above mentioned.

In San Juan, Puerto Rico, 17 of April, 1980.

LUIS FRANCISCO HERNANDEZ VELEZ

Luis Francisco Hernández Vélez
Notary Public

Exhibit 39

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Efrain Lopez, Jorge L. de Jesus,
Ileana Fort, Directors
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: Matter Under Review (MUR) 1370

Dear Directors:

Enclosed is a subpoena to produce certain documents and materials and to answer written questions issued by the Federal Election Commission ("Commission") to Lopito, Ileana and Howie, Inc., in connection with the above referenced matter under review.

The subpoena requires that production of specified documents be made and that responses to the interrogatories be propounded, to the Commision within fifteen (15) days of your receipt of the enclosed subpoena, by sending them certified mail to the address noted in the subpoena.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits any person from making public the act of "any notification of investigation" by the Commission unless the respondent instructs the Commission, in writing, to make the investigation public. No such written permission has been received in this matter.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure: Subpoena

Attachment I (continued)
(cover letter)

6204033326

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND TO ANSWER WRITTEN QUESTIONS

TO: David Sawyer
DHS Films, Inc.
60 West 55th Street
New York, NY 10019

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), DHS Films, Inc. is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession, custody, or control of DHS Films, Inc. or of any of its directors, officers, agents, or employees. Production is to be made by sending the documents, certified mail, to the Office of General Counsel of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C., within fifteen (15) days of receipt of this subpoena. In addition, DHS Films, Inc. is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission at the address above, also within fifteen (15) days of receipt of this subpoena.

6204033327

DEFINITIONS AND INSTRUCTIONS

As used in this subpoena, the terms listed below are defined as follows:

1. The term "documents and materials" shall mean the original, all copies, and drafts of writings or printed materials of any kind, including but not limited to correspondence, memoranda, reports, transcripts, minutes, notes, letters, lists,

Attachment I (continued)
Subpoena to DHS Films
(5 pages + 4 Exhibits and Cover Letter)

telexes, telegrams, messages(including reports, notes, memoranda and any other documentation of telephone conversations and conferences), calendar and diary entries, contracts, data, computer print-outs, invoices, account statements, billing forms, receipts, checks and other negotiable paper, records, and compilations in the possession, custody or control of the DHS Films, Inc., its directors, officers, agents, and employees. Designated "documents and materials" are to be taken as including all attachments, enclosures and other documents that are attached to, relate to, or refer to such designated "documents and materials".

2. "DHS Films, Inc.," shall mean the corporation to whom this subpoena is directed, and its directors, officers, employees, and agents.

3. "Kennedy for President Committee" or "KFP" shall mean the principal campaign committee authorized by Senator Edward Kennedy to make expenditures and receive contributions on behalf of his campaign for the 1980 Democratic nomination for the Office of President, and its affiliated committee, Kennedy for President Committee/Puerto Rico, as well as the officers, employees, staff, agents, and volunteers of any of the aforementioned political committees.

4. "Identify" with respect to a person shall mean to give the full name, last known residence address of such individual, the last known place of business where such individual is or was employed, the title of the job or position held with the committee or group in question, and the dates of such service.

5. "And" as well as "or" shall be construed disjunctively or conjunctively as necessary to bring within the scope of this subpoena any documents and responses which may be construed to be out of their scope.

If any document called for herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, together with the following information.

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;

8204033228

(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please respond to the following interrogatories:

1. Provide in detail the terms and conditions under which DHS Films, Inc. rendered services to KFP during the period of January 1, 1979 to December 31, 1980, and identify the person(s) who negotiated these terms and conditions on behalf of DHS Films, Inc., and KFP. Your response to this interrogatory should also specify the terms and conditions of any agreement for the extension of credit by DHS Films, Inc. to KFP, including the duration of any such extension of credit, and the circumstances under which the extension of credit would be granted.

(a) Indicate whether any of the above terms and conditions were set forth by virtue of an oral agreement, or if contained in a written contract or some other written memorialization; and provide the date of such oral or written agreement.

2. For each of Exhibits 1 through 2, attached hereto, provide the following information:

8204033229

a) identify the person who prepared the document;

b) the date it was sent to KFP;

c) the date payment by KFP of the amount indicated on the document was due;

d) the date when payment of the amount due was received from KFP, and if such payment was made in installments or increments rather than a lump sum, provide the date and amount of each installment or increment;

e) for each payment listed in response to part d) of this interrogatory, indicate the form (i.e. cash, bank check, KFP check, money order, etc.) in which payment was made.

3. Attached as Exhibits 3 and 4 are copies of four checks made to the order of David Sawyer. For each of these checks, provide the following:

a) whether the check was received by DHS Films, Inc. for services rendered or to be rendered to KFP;

b) if the answer to part a), above, is in the affirmative, the date the check was received;

c) identify the person(s) who transferred the check to DHS, Inc., or if that person is David Sawyer, identify the person who presented the check to David Sawyer;

d) describe the services provided or to be provided for which payment of the check was made by KFP, and the date(s) those services were actually rendered.

0204033230

Produce the following in their entirety:

A. All documents and materials which contain, concern, or in any way refer to the terms and conditions under which DHS Film, Inc. provided services to KFP.

B. All documents and materials which record, refer to, or otherwise indicate the receipt of a payment from KFP to DHS Films, Inc., for services rendered or to be rendered.

C. All invoices, bills, or other statements of account concerning services provided or to be provided by DHS Films, Inc. to KFP.

WHEREFORE, the of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this day of 1981.

6204033231

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

DHS FILMS, INC. 60 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

2/27/80

Miguel Lausel.
Comite pro Kennedy
Avenida Roosevelt
244 Hato Rey
Puerto Rico 00918

Invoice # 985

Production of Two Radio and Two Television Spots

| | | |
|---|---|---|
| Cameraman | @ $500.00 p.d. | $ 1,500.00 |
| Assistant Cameraman | @ 190.00 p.d. | 490.00 |
| Rawstock & Labs | | 1,322.70 |
| Equipment | | 700.50 |
| Travel & Subsistence - including Mascoretta & Sawyer | | 3,744.20 |
| Narration Recording and Dupes | | 300.00 |
| Sprint Telephone & Messengers | | 300.00 |
| Editing | | 2,475.00 |
| Finishing | | 283.00 |
| Art Work | | 250.00 |
| Video Transfer & Assembly | | 2,260.00 |
| Video Dupes | | 140.00 |
| Stock Footage | | 1,200.00 |
| Narrator | | 600.00 |
| Production Manager | | 750.00 |
| David Sawyer | | 2,400.00 |
| Insurance | | 856.00 |
| | Sub Total | 19,571.40 |
| | 15% Overhead | 2,935.71 |
| | Total | $ 22,507.11 |

Exhibit I

DHS FILMS, INC. 60 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

2/27/80

Miguel Lausel
Comite pro Kennedy
Ave. Roosevelt
244 Hato Rey
Puerto Rico 00918

Invoice # 986

Jeddu Mascoretto as line producer and director-writer of the
Radio and TV spots - Kennedy Single and Tradition.....$3,500.00

Exhibit 2

OFFICIAL CHECK

**BANCO POPULAR DE PUERTO RICO**
SAN JUAN, PUERTO RICO

1-231
260

90040183

58-12-1

MARCH 12,1980, $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B. P. P. R. POPULAR CENTER 3000 DOLS 00 CTS ---------- DOLLARS

OVER $500 TWO SIGNATURES REQUIRED

Authorized Signature 1031

Countersignature Mercedes Ozan Lauer 4-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040183⑈ ⑆0260-0881⑆ 90-9000 3-0⑈

OFFICIAL CHECK

**BANCO POPULAR DE PUERTO RICO**
SAN JUAN, PUERTO RICO

1-231
260

90040186

58-12-1

MARCH 10,1980, $**2,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B. P. P. R. POPULAR CENTER 2000 DOLS 00 CTS ---------- DOLLARS

OVER $500 TWO SIGNATURES REQUIRED

Authorized Signature 10-31

Countersignature Mercedes Ozan Lauer 4-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040186⑈ ⑆0260-0881⑆ 90-9000 3-0⑈

8 2 0 4 0 3 3 3 2 3 4

Exhibit 3

OFFICIAL CHECK

# BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

90040184

58-12-1

MARCH 19,1930. $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B.P.P.R. POPULAR CENTER 3000 DOLS 00 CTS DOLLARS

OVER $500.00 TWO SIGNATURES REQUIRED

Adam H. Olen IV-31
AUTHORIZED SIGNATURE

Mercedes Amaro Lugo
COUNTERSIGNATURE 4-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040184⑈ ⑆021260088⑆ 90-90003-0⑈

OFFICIAL CHECK

# BANCO POPULAR DE PUERTO RICO

1611
260

SAN JUAN, PUERTO RICO

90040185

58-12-1

MARCH 19,1930. $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B.P.P.R. POPULAR CENTER 3000 DOLS 00 CTS DOLLARS

OVER $500.00 TWO SIGNATURES REQUIRED

Adam H. Olen IV-31
AUTHORIZED SIGNATURE

Mercedes Amaro Lugo
COUNTERSIGNATURE III-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040185⑈ ⑆021260088⑆ 90-90003-0⑈

Exhibit 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

David Sawyer
DHS Films, Inc.
60 West 55th Street
New York, NY 10019

RE: Matter Under Review (MUR) 1370

Dear Mr. Sawyer:

Enclosed is a subpoena to produce certain documents and materials and to answer written questions issued by the Federal Election Commission ("Commission") to DHS Films, Inc., in connection with the above-referenced matter under review.

The subpoena requires that production of specified documents be made, and that responses to the interrogatories be propounded, to the Commission within fifteen (15) days of your receipt of the enclosed subpoena, by sending them certified mail to the address noted in the subpoena.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits any person from making public the fact of "any notification of investigation" by the Commission unless the respondent instructs the Commission, in writing, to make the investigation public. No such written permission has been received in this matter.

If you have any questions, contact Marsha Gentner, the attorney handling this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

Attachment I (continued)
Cover letter

2040333236

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO ANSWER WRITTEN QUESTIONS

TO: Orealis Orama
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: MUR 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1), Orealis Orama is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, by mailing same, to the Federal Election Commission, Office of General Counsel, 1325 K Street, N.W., Washington, D.C., 20463 within ten (10) days of receipt of this subpoena.

Please respond to the following interrogatories:

1. What is your position with Lopito, Ileana and Howie, Inc.

a) How long have you held that position?

2. Were you present on any occasion with Senior Julio Hector Morales when payment of cash was received from any person on behalf of the Kennedy for President Committee/ Puerto Rico ("KFP/PR")?

3. If the answer to Interrogatory 2, above, is in the affirmative, provide the date of each such cash payment for which you were present, the amount of cash received on that date, the container (i.e. suitcase, bags, etc.) the money was brought in to Lopito, Ileana and Howie, Inc., and the name and address of every other person

Attachment I (continued)
Subpoena to Ms. Orama
(2 pages + Cover letter)

2040332337

person present who witnessed the aforementioned transfer(s) of cash from KFP/PR to Lopito, Ileana and Howie, Inc.

WHEREFORE, the of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this day of 1981.

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033332238

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Orealis Orama
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: Matter Under Review (MUR) 1370

Dear Ms. Orama:

Enclosed please find a subpoena to answer written questions issued to you by the Federal Election Commission ("Commission") in connection with the above-referenced matter under review. The subpoena requires that your respond to the interrogatories propounded therein by sending them to the Commission within ten (10) days of your receipt of the enclosed subpoena.

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits any person from making public the fact of "any notification of investigation" by the Commission unless the respondent instructs the Commission, in writing, to make the investigation public. No such written permission has been received in this matter.

If you have any questions, please call Marsha Gentner, the attorney handling this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

Attachment I (continued)
(cover letter)

6204033323 9

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

## AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas to produce documents and materials and to answer written questions to the following persons in connection with MUR 1370.

Kennedy for President Committee
P. O. Box 3743
Washington, D. C. 20007

Efrain Lopez, Jorge L. de Jesus,
Ileana Font, Directors
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

Orealis Orama
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

David Sawyer
DHS Films, Inc.
60 West 55th Street
New York, NY 10019

9204033240

John W. McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

Attachment II

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

# AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of subpoenas to produce documents and materials and to answer written questions to the following persons in connection with MUR 1370.

Kennedy for President Committee
P. O. Box 3743
Washington, D. C. 20007

Efrain Lopez, Jorge L. de Jesus,
Ileana Font, Directors
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

Orealis Orama
Lopito, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

David Sawyer
DHS Films, Inc.
60 West 55th Street
New York, NY 10019

6204033324

John W. McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

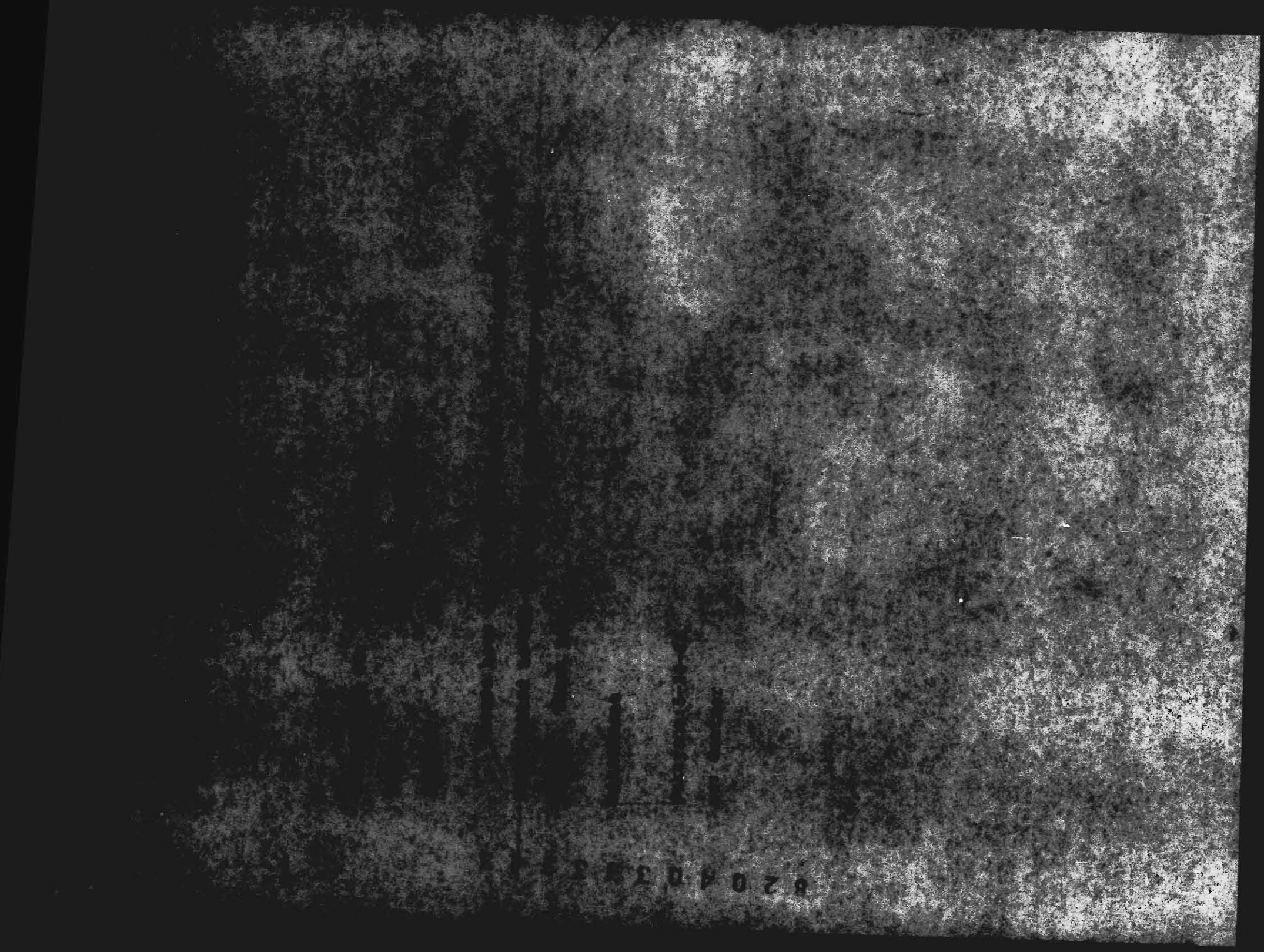
DATE: MAY 21, 1981

SUBJECT: MUR 1370 - Interim Investigative Report #2, dated 5-19-81; Signed 5-20-81; Received in OCS 5-20-81, 12:03

The above-named document was circulated on a 24 hour no-objection basis at 4:00, May 20, 1981.

No objections were received in the Office of the Commission Secretary to the Interim Investigative Report at the time of the deadline.

6204033242



BEFORE THE FEDERAL ELECTION COMMISSION
May 19, 1981

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 MAY 20 P12: 03

In the Matter of )
)
Kennedy for President ) MUR 1370
Committee )

**SENSITIVE**

**INTERIM INVESTIGATIVE REPORT #2**

On February 23, 1981, the Commission found reason to believe the Kennedy for President Committee ("KFP") violated the Federal Election Campaign Act of 1971, as amended ("the Act") by the actions of the KFP Puerto Rico affiliate in connection with a fund-raising radio "marathon" sponsored by that committee. An investigation of those activities was immediately undertaken by the General Counsel's office, and included, inter alia, the issuance of three subpoenas for deposition. These depositions were conducted by Office of General Counsel staff on May 5-6, 1981. The information obtained in the aforementioned depositions made it apparent to the Office of General Counsel staff handling this matter that additional follow-up interrogatories and requests for production of documents must be pursued. However, in order to assure that these interrogatories and subpoenas duces tecum are as comprehensive as possible, the General Counsel's office has refrained from forwarding them for the Commission's consideration until after Office of General Counsel staff has had an opportunity to review the deposition transcripts. These transcripts are expected to be received from San Juan, Puerto Rico within the next two weeks.

20 May 81
Date

Charles N. Steele
General Counsel

8204033244

OFFICE OF THE
GENERAL COUNSEL

81 MAY 7 PM 1:02

May 5, 1981

82040332345

Federal Election Commission
Washington, D.C. 20463

Gentlemen:

Please be advised that I shall have the legal counsel of Attorney William C. Oldaker, Suite 1200, 1050 Seventeenth Street, N.W., Washington, D.C. 20036.

Also, I would like a translator to be present at the deposition.

Hoping this meets your requirements, I remain,

Yours truly,

Julio Hector Morales

:seu

LOPITO, ILEANA & HOWIE, INC.
Concordia 716
Miramar
Puerto Rico
Tel 724-7260

8 2 0 4 0 3 3 3 2 4 6

LOPITO,
ILEANA &
HOWIE, INC.
Concordia 716.
Miramar,
Puerto Rico
00907

OFFICE OF GENERAL COUNSEL

81 MAY 7 P12:02

Received by
Marsha Gentner
on 5/6/81
10:00 a.m.
MWR 1370

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 12, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Julio Hector Morales
Lopita, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

RE: MUR 1370

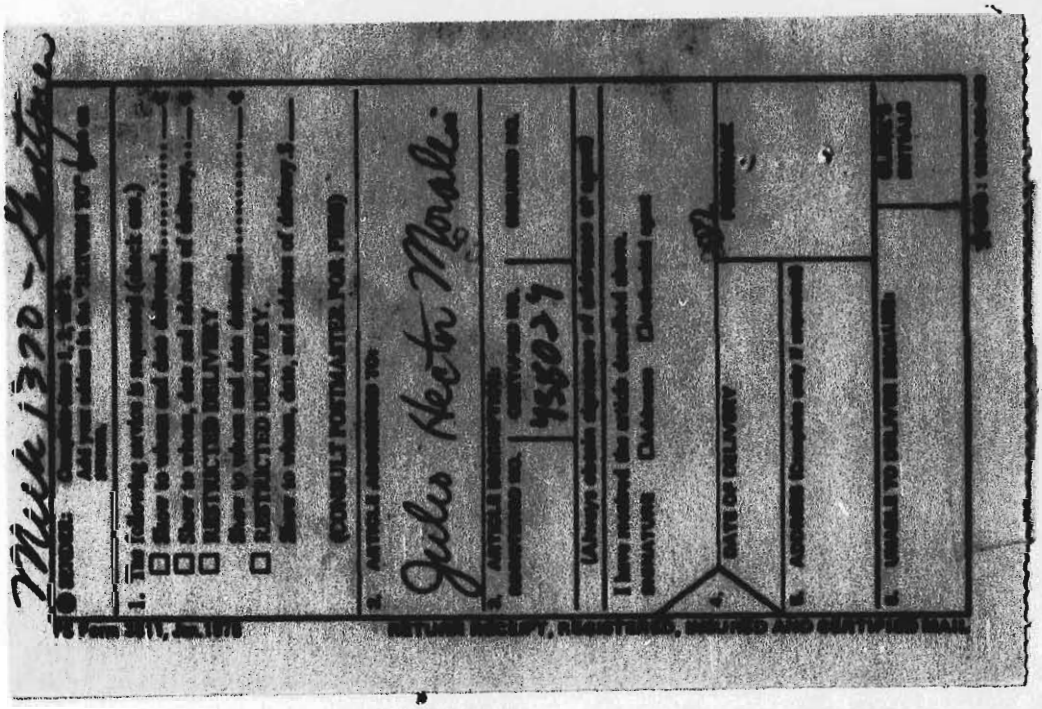
Dear Mr. Morales:

Enclosed please find a witness fee check for your deposition appearance on May 6, 1981.

Sincerely,

Marsha G. Gentner
Attorney

Enclosure




8204033247

TREASURY
FISCAL SERVICE
DIVISION OF DISBURSEMENT

WASHINGTON, D. C.

Check No. 34,394,760
SYMBOL 3004

DO NOT FOLD, SPINDLE OR MUTILATE
KNOW YOUR ENDORSER ... REQUIRE IDENTIFICATION

United States Treasury 15-51/000

PAY TO THE ORDER OF JULIO HECTOR MORALES

| DOLLARS | CTS |
|---|---|
| $****35 | 00 |

| MONTH | DAY | YEAR |
|---|---|---|
| 04 | 30 | 81 |

95350001

F E C
WASH DC
N1199

FE1AW387 WITNESS FEE
MUR 1370

⑈30046⑈ ⑆000000518⑆ 34394760⑈

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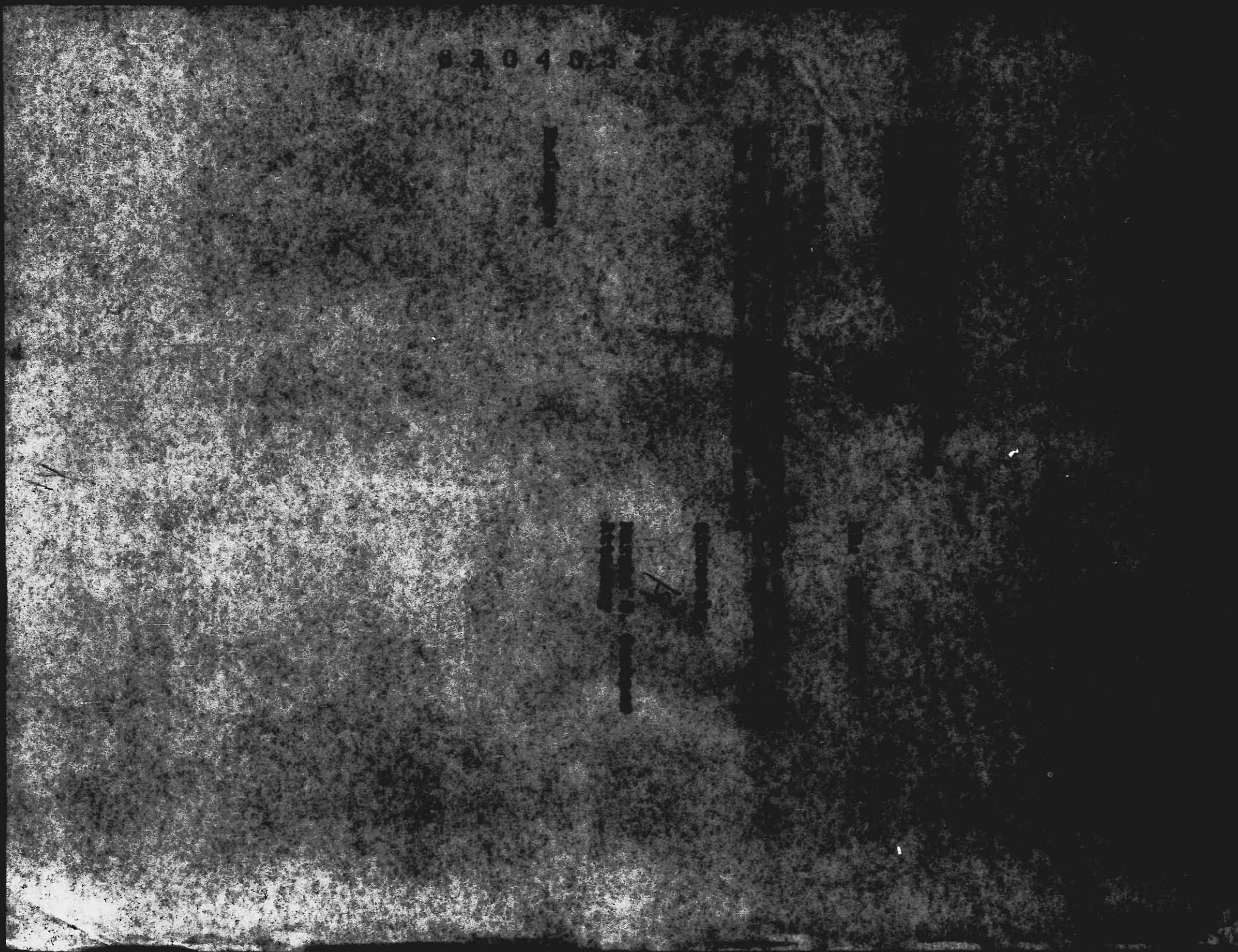


FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 1981

CERTIFIED MAIL
RETURN RECIEPT REQUESTED

Julio Hector Morales
Administrative Officer
Lopita, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico 00907

RE: MUR 1370

Dear Mr. Morales:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 6, 1981 at 10:00 a.m. has been issued.

Please be advised that, as the deposition is being taken as part of a Commission investigation, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission where, as here, no express written consent to that effect has been received by the parties who are the subject of the investigation.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition. In addition, if any special arrangements are necessary, such as the presence of a translator at the deposition, please so advise this office immediately.

8204033250

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commisison is paid $30.00, plus mileage at the rate of 22.5 cents per mile. A check made payable to you to cover this fee will be handed to you at the deposition.

Please confirm your scheduled appearance with Marsha Gentner by calling her, collect, at (202) 523-5071, upon your receipt of this notification.

If you have any questions, please feel free to call Ms. Gentner, the attorney handling this matter, at the above listed number.

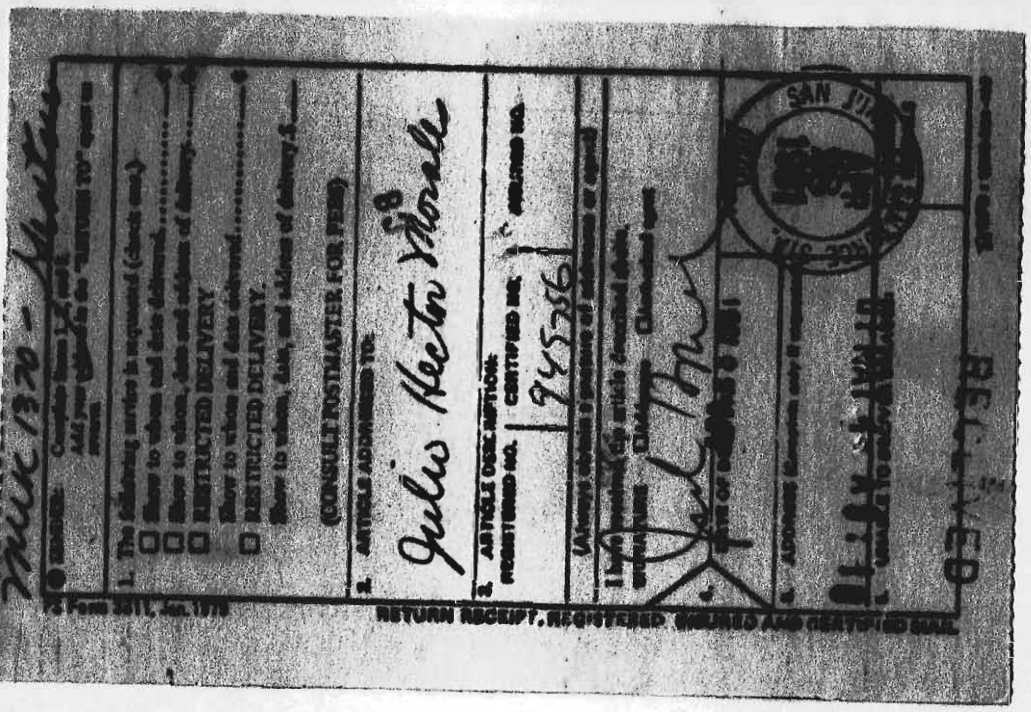
Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

8204033251



UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

**Subpoena To Appear For Deposition Upon Oral Examination**

TO: Julio Hector Morales
Administrative Officer
Lopita, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico 00907

RE: Matter Under Review 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3) and (4), you are hereby ordered to appear for deposition in connection with the Commission's investigation of possible violations of the Federal Election Campaign Act of 1971, as amended, by the following respondent: Kennedy for President Committee.

Notice is hereby given that the deposition is to be taken at Conference Room, 3101 Federal Office Building, Chardon Avenue, Hato Ray, Puerto Rico, at 10:00 a.m. on May 6, 1981, and any and all dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 20 day of April 1981.

John Warren McGarry
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033254

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Miguel D. Lausell
Campaign Director, Kennedy for
President Committee - Puerto Rico
Suite 1602
Banco Central y Economias
221 Ponce de Leon Avenue
Hato Rey, Puerto Rico 00917

RE: MUR 1370

Dear Mr. Lausell:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 5, 1981 at 10:00 a.m. has been issued.

Please be advised that, as the deposition is being taken as part of a Commission investigation, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission where, as here, no express written consent to that effect has been received by the parties who are the subject of the investigation.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition. In addition, if any special arrangements are necessary, such as the presence of a translator at the deposition, please so advise this office immediately.

8204033255

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commisison is paid $30.00, plus mileage at the rate of 22.5 cents per mile. A check made payable to you to cover this fee will be handed to you at the deposition.

Please confirm your scheduled appearance with Marsha Gentner by calling her, collect, at (202) 523-5071, upon your receipt of this notification.

If you have any questions, please feel free to call Ms. Gentner, the attorney handling this matter, at the above listed number.

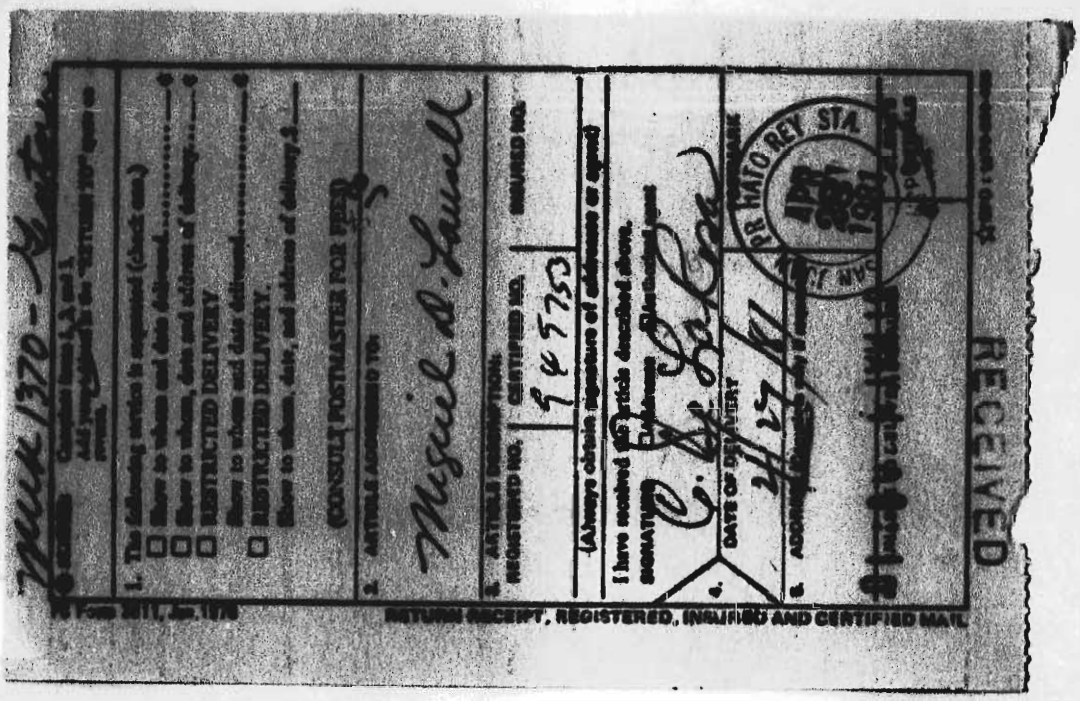
Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

8204033256



UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

## Subpoena To Appear For Deposition Upon Oral Examination

TO: Miguel D. Lausell
Campaign Director, Kennedy for President Committee
Suite 1602
Banco Central y Economias
221 Ponce de Leon Avenue
Hato Rey, Puerto Rico 00917

RE: Matter Under Review 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3) and (4), you are hereby ordered to appear for deposition in connection with the Commission's invesigation of possible violations of the Federal Election Campaign Act of 1971, as amended by the following persons: Kennedy for President Committee.

Notice is hereby given that the deposition is to be taken at the Conference Room, 3101 Federal Office Building, Chardon Avenue, Hato Rey, Puerto Rico, at 10:00 a.m. on May 5, 1981, and any and all dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 20 day of April 1981.

John Warren McGarry
Federal Election Commission

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

8204033259

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 24, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Miguel A. Rivera
Suite 1030
Banco Popular Center
Ponce de Leon Avenue
Hato Rey, Puerto Rico 00917

RE: MUR 1370

Dear Mr. Rivera:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on May 5, 1981 at 2:00 p.m. has been issued.

Please be advised that, as the deposition being taken as part of a Commission investigation, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission where, as here, no express written consent to that effect has been received by the parties who are the subject of the investigation.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition. In addition, if any special arrangements are necessary, such as the presence of a translator at the deposition, please so advise this office immediately.

0 2 0 4 0 3 3 3 2 6 0

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commisison is paid $30.00, plus mileage at the rate of 22.5 cents per mile. A check made payable to you to cover this fee will be handed to you at the deposition.

Please confirm your scheduled appearance with Marsha Gentner by calling her, collect, at (202) 523-5071, upon your receipt of this notification.

If you have any questions, please feel free to call Ms. Gentner, the attorney handling this matter, at the above listed number.

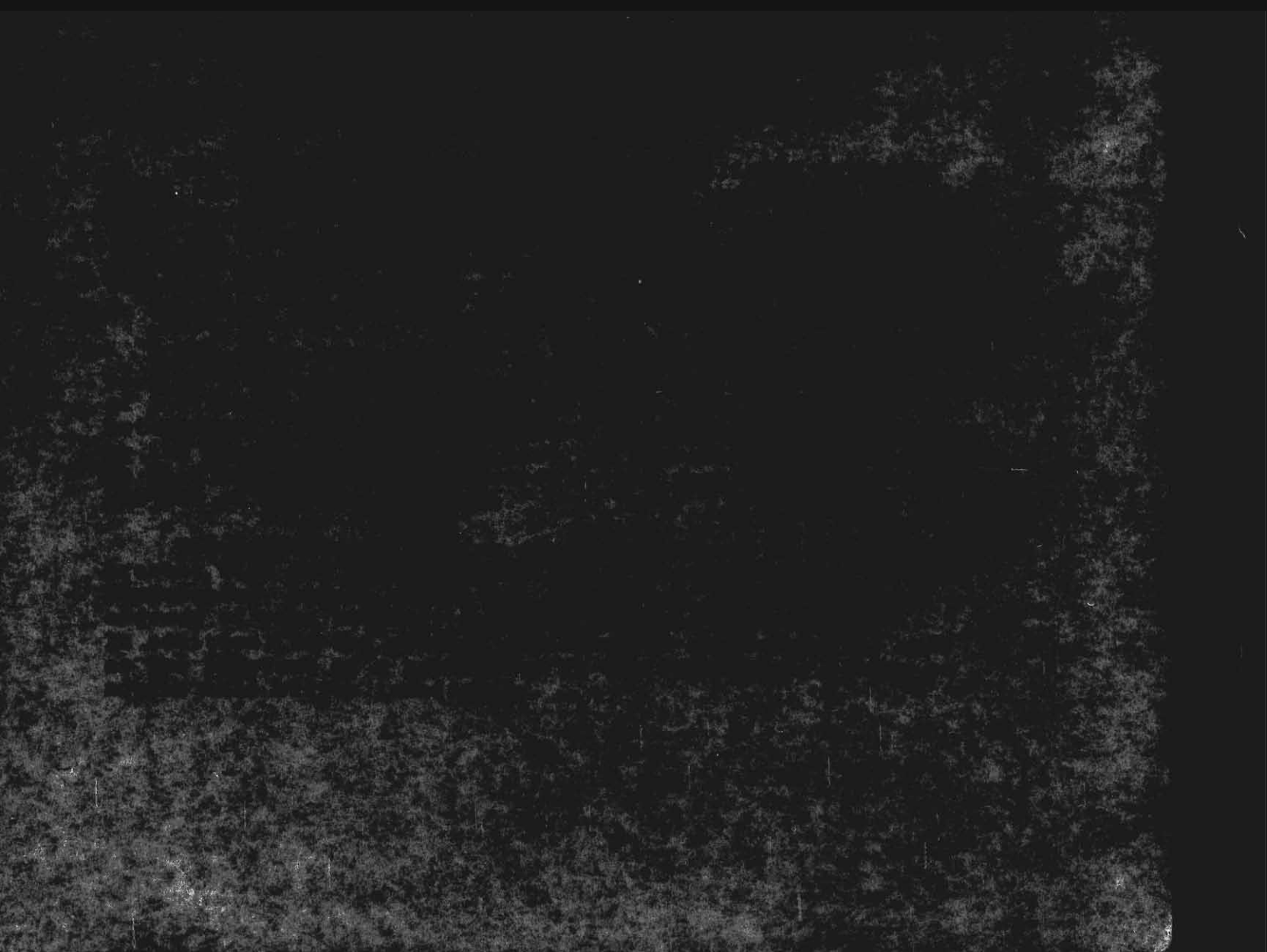
Sincerely,

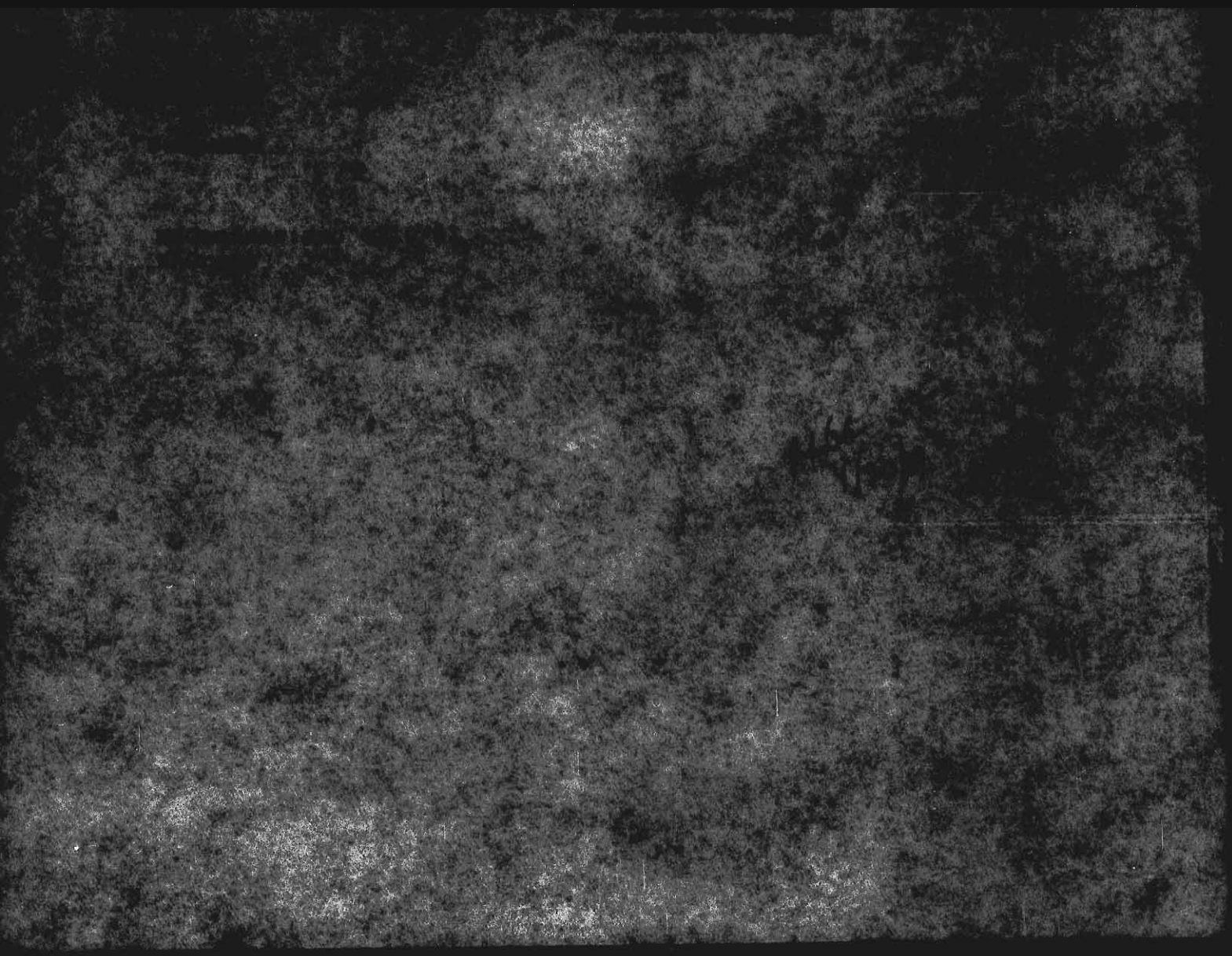
Charles N. Steele
General Counsel

Enclosure

Subpoena

8204033261





UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

## Subpoena To Appear For Deposition Upon Oral Examination

TO: Miguel A. Rivera
Suite 1030
Banco Popular Center
Ponce de Leon Avenue
Hato Rey, Puerto Rico 00917

RE: Matter Under Review 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3) and (4), you are hereby ordered to appear for deposition in connection with the Commission's investigation of possible violations of the Federal Election Campaign Act of 1971, as amended, by the following persons: Kennedy for President Committee.

Notice is hereby given that the deposition is to be taken at Conference Room, 3101 Federal Office Building, Chardon Avenue, Hato Rey, Puerto Rico, at 2:00 p.m. on May 5, 1981, and any and all dates adjourned to by the Commission.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this 20 day of April, 1981

John Warren McGarry
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033264

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

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: APRIL 20, 1981

SUBJECT: SUBPOENAS REGARDING MUR 1370

The attached subpoenas regarding MUR 1370, Commission approved April 17, 1981, by a vote of 6-0, have been signed and sealed this date.

Attachment:
Subpoenas (3)
Morales, Rivera, Lausell

8204033265

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
) MUR 1370
Julio H. Morales )
Miguel D. Lausell )
Liguel A. Rivera )

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 17, 1981, the Commission approved by a vote of 6-0 the General Counsel's recommendation to authorize the issuance of subpoenas for deposition of Julio H. Morales, Miguel D. Lausell and Miguel A. Rivera as attached to the General Counsel's Memorandum to the Commission dated April 14, 1981.

Attest:

4-17-81
Date

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

Received in Office of Commission Secretary: 4-14-81, 2:31
Circulated on 48 hour vote basis: 4-15-81, 11:00

8204033266

WILLIAM C. OLDAKER
ATTORNEY AT LAW
1050 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20036

TELEPHONE
202 296-0505

CABLE ADDRESS: "OLDALAW"
710-822-0227

GCC#4534
81 APR22 A8:52

April 20, 1981

81 APR 22 A9:49

FEDERAL ELECTION COMMISSION
GENERAL COUNSEL'S OFFICE

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: MUR 1370

Dear Mr. Steele:

This is in response to your letter of April 8, 1981, received by the Kennedy for President Committee ("the Committee") on April 14, 1981, requesting responses to two interrogatories we inadvertently failed to answer, and additional information in response to an interrogatory we partially answered.

The requested responses are:

E. See pp. 1-2 for Line 17A of the Committee's Comprehensive Amendment filed on December 12, 1980 (copy enclosed).

F. (1)(i) As stated in our response to the Commission's Subpoena (at 2(a)), the Committee does not know the exact date of the payment to Lopito, Ileana & Howie. We believe it was made in April 1980. We have requested this information from Puerto Rico and will provide it when available.

(ii) The payment to David Sawyer of DHS Films, Inc. was made on March 19, 1980, in the form of four cashier's checks drawn on the Banco Popular de Puerto Rico: three checks in the amount of $3,000 and one check in the amount of $2,000.

(2) For payment to Lopito, Ileana & Howie, see p. 11 for Lines 24 and 27 of the Committee's Comprehensive Amendment filed on December 12, 1980. For payment to David Sawyer, see p. 9 for Lines 24 and 27 of the same document. (The amended report erroneously omits the $2,000 cashier's check to David Sawyer dated March 19, 1980. The Committee is filing an amendment to correct this discrepancy.)

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G. Because all the contributions received through the radio marathon were in amounts less than $50, we understand no records were maintained of the name and address of contributors. Sr. Rivera's affidavit indicates the payment of $88,223.33 from Ileana, Lopito and Lowie was made in cash out of the monies collected through the radio marathon. (See Rivera Affidvait at paragraph 6).

We apologize for any inconvenience caused by our oversight. Please contact us if we may be of any additional assistance.

Sincerely,

William C. Oldaker

WCO/smv
Enclosure: Comprehensive Amendment

8204033268

FEDERAL ELECTION COMMISSION
WASHINGTON DC 20463

81 APR 30 AM 8:04
80 DEC 12 AM 11:19
DATE & TIME

RECEIPT FOR HAND-DELIVERED DOCUMENTS

FROM: KENNEDY FOR PRESIDENT
COMPREHENSIVE AMENDMENT

NUMBER OF DOCUMENTS 1

RECEIVED BY

Craig J. Bolling

82040333269

RECEIVED

81 APR22 A8:52

FEC Form 3P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

# Comprehensive Amendment

## REPORT OF RECEIPTS AND EXPENDITURES By a Candidate or Authorized Committee of a Candidate Seeking Nomination or Election to the Office of President or Vice President of the United States

**NOTE:** *This report is to be used by a candidate or authorized committee of a candidate seeking nomination or election to the Office of President or Vice President of the United States whether or not public funds are used.*

1 (a) NAME OF CANDIDATE OR COMMITTEE IN FULL ☐ Check if name or address is changed
Kennedy For President Committee

(b) ADDRESS (Number and Street)
P O Box 3743

(c) CITY, STATE AND ZIP CODE
Washington D.C. 20007

2 IDENTIFICATION NUMBER
C00 115 022

3 Is this report of receipts and expenditures for:
☒ PRIMARY
☐ GENERAL

4 TYPE OF REPORT (Check appropriate box and complete, if applicable)
(a) ☒ Amendment for Jan. - June 1980 (which report)
(b) ☐ April 10 Quarterly Report
(c) ☐ July 10 Quarterly Report
(d) ☐ October 10 Quarterly Report
(e) ☐ January 31 Year End Report
(f) ☐ Monthly Report _____ (state month)
(g) ☐ Termination Report
(h) ☐ Tenth day report preceding _____ Election on _____ in the State of _____
(i) ☐ Thirtieth day report following ___ Election on _____ in the State of _____

## CANDIDATE OR COMMITTEE SUMMARY OF RECEIPTS AND EXPENDITURES

5 COVERING PERIOD: FROM THROUGH

| Section A – Cash Balance Summary | Column A This Period | ADDITIONS INCREASE $(DECREASE) |
|---|---|---|
| 6 Cash on Hand January 1, 19___ | | |
| 7 Cash on Hand at Beginning of Reporting Period | $ | |
| 8 Total Receipts (from Line 23) | $ | $ 111,940 |
| (a) Subtotal (Add Lines 7 and 8) | $ | $ |
| 9 Total Expenditures (from Line 28) | $ | $ 198,046 |
| 10 Cash on Hand at Close of Reporting Period (Subtract Line 9 from Line 8a) | $ | $(86,106) |
| 11 Contributed Items on Hand to be Liquidated (Attach Itemized List) ... $_____ | | |
| **DEBTS AND OBLIGATIONS** | | |
| 12 Debts and Obligations Owed TO the Committee (Itemize all on Schedule C-P) | $ | |
| 13 Debts and Obligations Owed BY the Committee (Itemize all on Schedule C-P) | $ | |
| **Section B – Summary of Expenditures Subject to Limitation** | | |
| 14 Expenditure Total (Add Lines 24c and 26b) | $ | $ 183,705 |
| 15 Refunds and Rebates (from Line 21c) | $ | $ – |
| (a) Expenditures Subject to Limitation (Subtract Line 15 from Line 14) | $ | $ 183,705 |
| (b) Expenditures from Prior Years Subject to Limitation | | $ – |
| (c) Total Expenditures Subject to Limitation (Add Lines 15a and 15b) | | $ 183,705 |

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

William C Oldaker — (Typed Name of Treasurer or Candidate)

(Signature of Treasurer or Candidate)

12/10/80 — (Date)

**NOTE:** Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g, §441j; and 26 U.S.C. §9012, §9042.

For further information Contact:

Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463
or Call 800/424-9530

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

COMPREHENSIVE AMENDMENT

DETAILED SUMMARY OF RECEIPTS AND EXPENDITURES (Page 2, FEC Form 3P)

COMPREHENSIVE AMENDMENT

| Name of Candidate or Committee | REPORT COVERING THE PERIOD: FROM: | TO: |
|---|---|---|
| Senator Kennedy | Jan | June '80 |

| RECEIPTS | Increase | Calendar Year to Date |
|---|---|---|
| 16 FEDERAL FUNDS (Itemize on Schedule A-P) | $ | $ |
| 17 Contributions from Individuals (including contributions in-kind): | | |
| (a) Itemized (use Schedule A-P) | $ 4,700. | |
| (b) Unitemized | $ 107,240. | |
| (c) Sales and Collections Included Above: List by Event on Memo Schedule D-P ($ ) | | |
| (d) Subtotal of Contributions from Individuals (including contributions in-kind) | $ 111,940 | $ |
| 18 Transfers In from Political Committees (including contributions in-kind): | | |
| (a) From Affiliated/Authorized Committee (Itemize on Schedule A-P Regardless of Amount) | $ | |
| (b) From Other Committees (Itemize on Schedule A-P Regardless of Amount) | $ | |
| (c) Subtotal of Transfers In from Political Committees (including contributions in-kind) | $ | $ |
| 19 Other Income: | | |
| (a) Itemized (use Schedule A-P) | $ | |
| (b) Unitemized | $ | |
| (c) Subtotal of Other Income | $ | $ |
| 20 Loans and Loan Repayments Received: | | |
| (a) Itemized (use Schedule A-P) | $ | |
| (b) Unitemized | $ | |
| (c) Subtotal of Loans and Loan Repayments Received | $ | $ |
| 21 Refunds, Rebates, Returns of Deposits: | | |
| (a) Itemized (use Schedule A-P) | $ | |
| (b) Unitemized | $ | |
| (c) Subtotal of Refunds, Rebates, Returns of Deposits | $ | $ |
| 22 Refunds and Rebates Relating to Exempt Fundraising, Legal and Accounting Fees: | | |
| (a) Itemized (use Schedule A-P) | $ | |
| (b) Unitemized | $ | |
| (c) Subtotal | $ | $ |
| 23 TOTAL RECEIPTS | $ 111,940 | $ |

| EXPENDITURES | | |
|---|---|---|
| 24 Operating Expenditures: | | |
| (a) Itemized (use Schedule B-P) | $ 183,705 | |
| (b) Unitemized | $ | |
| (c) Subtotal of Operating Expenditures | $ 183,705 | $ |
| 25 Exempt Fundraising, Legal and Accounting Expenditures: | | |
| (a) Itemized (use Schedule B-P) | $ 14,341 | |
| (b) Unitemized | $ | |
| (c) Subtotal of Exempt Fundraising, Legal and Accounting Expenditures | $ 14,341 | $ |
| 26 Transfers Out: | | |
| (a) To Affiliated Committees (Itemize on Schedule B-P Regardless of Amount) | $ | |
| (b) To Other Committees (Itemize on Schedule B-P Regardless of Amount) | $ | |
| (c) Subtotal of Transfers Out | $ | $ |
| 27 Loans, Loan Repayments, and Contribution Refunds Made: | | |
| (a) Itemized (use Schedule B-P) | $ | |
| (b) Unitemized | $ | |
| (c) Subtotal of Loans, Loan Repayments, and Contribution Refunds | $ | $ |
| 28 TOTAL EXPENDITURES | $ 198,046 | $ |

| RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES | |
|---|---|
| 29 TOTAL RECEIPTS (from Line 23) | $ 111,940. |
| 30 TRANSFERS IN (from Line 18a) | $ - |
| 31 NET RECEIPTS (Subtract Line 30 from Line 29) | $ 111,940. |
| 32 TOTAL EXPENDITURES (from Line 28) | $ 198,046. |
| 33 TRANSFERS OUT (from Line 26a) | $ - |
| 34 NET EXPENDITURES (Subtract Line 33 from Line 32) | $ 198,046 |

Approved by GAO, B-187620 (RO571), Expires 82-2-28

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FEC Form 3Pa
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

**COMPREHENSIVE AMENDMENT**

**Allocation of Primary Expenditures by State for a Presidential Candidate**

**(TO BE USED ONLY IN CAMPAIGNS RECEIVING FEDERAL FUNDS)**

| 1(a) Name of Principal Campaign Committee | 2 Identification Number |
|---|---|
| KENNEDY FOR PRESIDENT COMMITTEE | C00115022 |
| (b) Committee Address<br>Box 3743 | 3 Name of Candidate<br>KENNEDY |
| (c) City, State and ZIP code<br>Washington, D.C. 20007 | |

COMPREHENSIVE AMENDMENT ALLOCATION BY STATE _COMPREHENSIVE AMENDMENT

| STATE | ALLOCATION THIS PERIOD | YEAR TO DATE ALLOCATION | STATE | ALLOCATION THIS PERIOD | INCREASE IN YEAR TO DATE ALLOCATION |
|---|---|---|---|---|---|
| Alabama | | | Nebraska | | |
| Alaska | | | Nevada | | |
| Arizona | | | New Hampshire | | |
| Arkansas | | | New Jersey | | |
| California | | | New Mexico | | |
| Colorado | | | New York | | |
| Connecticut | | | North Carolina | | |
| Delaware | | | North Dakota | | |
| District of Columbia | | | Ohio | | |
| Florida | | | Oklahoma | | |
| Georgia | | | Oregon | | |
| Hawaii | | | Pennsylvania | | |
| Idaho | | | Rhode Island | | |
| Illinois | | | South Carolina | | |
| Indiana | | | South Dakota | | |
| Iowa | | | Tennessee | | |
| Kansas | | | Texas | | |
| Kentucky | | | Utah | | |
| Louisiana | | | Vermont | | |
| Maine | | | Virginia | | |
| Maryland | | | Washington | | |
| Massachusetts | | | West Virginia | | |
| Michigan | | | Wisconsin | | |
| Minnesota | | | Wyoming | | |
| Mississippi | | | Puerto Rico | | 183,705 |
| Missouri | | | Guam | | |
| Montana | | | Virgin Islands | | |
| Column Totals | | | Column Totals | | |

| | | |
|---|---|---|
| 4 Total Allocated Expenditures ▶ | $ | $ 183,705 |
| 5 Total Non-allocated Expenditures ▶ | $ | $ 14,341.00 |
| 6 Total Campaign Expenditures (Lines 4 & 5) ▶ | $ | $ 198,046 |

SCHEDULE A-P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

# ITEMIZED RECEIPTS
(Contributions, Transfers, Contributions In-Kind, Federal Funds, Other Income, Loans, Refunds)

Supporting Lines 16, 17a, 18a, 18b, 19a, 20a, 21a and 22a of FEC Form 3P

Page 1 of 2 for LINE NUMBER 17A

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

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

Name of Candidate or Committee in Full
KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation / Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
|---|---|---|---|---|
| Cesar Andreu<br>Garden Hills, Guaymabo, PR | | | 3/14/80 | 200.00 |
| B. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation / Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Zulma Gonzalez<br>Magnolia FF-11 Rio Piedras, PR 00926 | | | /17/80 | 250.00 |
| C. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation / Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Ana Rosa Toro<br>Marginal C-29 Vista Alegre Ponce, PR | | | 3/80 | 250.00 |
| D. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation / Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Fernando Toro<br>Marginal C-29 Vista Alegre Ponce, PR | | | 3/80 | 250.00 |
| E. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation / Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Sebastian Cruz & Associates<br>Edificio El Caribe San Juan, PR 00901 | | | 4/10/80 | 250.00 |
| F. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation / Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Miguel A. Perez Comas<br>Apro. 3450 Mayaguez, PR 00708 | | | 3/10/80 | 250.00 |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) | $ 1450.00 |
| TOTAL This Period (last page this line number only) | $ |

82040333273

Approved by GAO, B-180720 (R0074), Expires 12-31-80

SCHEDULE A-P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

# ITEMIZED RECEIPTS
(Contributions, Transfers, Contributions In-Kind, Federal Funds, Other Income, Loans, Refunds)

Supporting Lines 16, 17a, 18a, 18b, 19a, 20a, 21a and 22a of FEC Form 3P



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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation | Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
|---|---|---|---|---|---|
| Ludo Ramon Mediz<br>Oaquieda H-45 Caguas, PR 00625 | | | | 3/10/80 | 500.00 |
| B. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation | Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Enrique Vazquez, Jr.<br>Box 842 Ponce, PR 00731 | | | | 3/6/80 | 250.00 |
| C. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation | Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Ramon Vega Sosa<br>Box 188 Humacao, PR 00661 | | | | 3/5/80 | 500.00 |
| D. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation | Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Pedro Zorrila Martinez<br>Ave. Ponce de Leon 252 Hato Rey, PR 00917 | | | | 3/10/80 | 500.00 |
| E. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation | Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Alberic Girod<br>Tetuan 355 San Juan, PR | | | | 4/10/80 | 500.00 |
| F. Full Name, Mailing Address and ZIP Code | Principal Place of Business | Occupation | Aggregate Year-To-Date ... ▶ $ | Date (month, day, year) | Amount of each receipt this period |
| Gumersindo Carmona Rivera<br>Box 82 Comerio, PR 00642 | | | | 3/8/80 | 1000.00 |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) ..... | $ 3250.00 |
| TOTAL This Period (last page this line number only) ..... | $ 4700.00 |

82040333274

Approved by GAO, B-187620 (R0571), Expires 12-31-80

SCHEDULE A-P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

# ITEMIZED RECEIPTS
## (Contributions, Transfers, Contributions In-Kind, Federal Funds, Other Income, Loans, Refunds)

Supporting Lines 16, 17a, 18a, 18b, 19a, 20a, 21a and 22a of FEC Form 3P

Page 1 of 1 for LINE NUMBER 17b

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| | | | |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Unitemized contributions | | Date (month, day, year)<br>4/11/80 | Amount of each receipt this period<br>1625.00 |
| Principal Place of Business | Occupation<br>Aggregate Year-To-Date . . . ▶ $ | | |
| B. Full Name, Mailing Address and ZIP Code<br>Unitemized contributions | | Date (month, day, year)<br>2/6/80 | Amount of each receipt this period<br>4000.00 |
| Principal Place of Business | Occupation<br>Aggregate Year-To-Date . . . ▶ $ | | |
| C. Full Name, Mailing Address and ZIP Code<br>Unitemized contributions | | Date (month, day, year)<br>2/28/80 | Amount of each receipt this period<br>2000.00 |
| Principal Place of Business | Occupation<br>Aggregate Year-To-Date . . . ▶ $ | | |
| D. Full Name, Mailing Address and ZIP Code<br>Unitemized contributions | | Date (month, day, year)<br>3/19/80 | Amount of each receipt this period<br>20.00 |
| Principal Place of Business | Occupation<br>Aggregate Year-To-Date . . . ▶ $ | | |
| E. Full Name, Mailing Address and ZIP Code<br>Unitemized contributions | | Date (month, day, year)<br>6/13/80 | Amount of each receipt this period<br>365.00 |
| Principal Place of Business | Occupation<br>Aggregate Year-To-Date . . . ▶ $ | | |
| F. Full Name, Mailing Address and ZIP Code<br>Unitemized contributions | | Date (month, day, year)<br>4/80 | Amount of each receipt this period<br>99230.33 |
| Principal Place of Business | Occupation<br>Aggregate Year-To-Date . . . ▶ $ | | |

| | |
|---|---|
| SUBTOTAL of Receipts This Page (optional) . . . . . | $ 107,240.33 |
| TOTAL This Period (last page this line number only) . . . . . | $ |

82040333275

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

5200-52

COMPREHENSIVE AMENDMENT

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

LINE NUMBER 27a

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Banco de Santander<br>San Juan, PR | Service charge | 1/80 | 6.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) | $ 6.00 |
| TOTAL This Period (last page this line number only) | $ |

C00240333276

SCHEDULE B-P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P



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

Name of Candidate or Committee in Full

Kennedy For President

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Express Print<br>G.P.O. 987<br>San Juan, P.R. 00936 | Printing costs: brochures, etc. | 1-18-80 | 5,000.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Roberto Yu<br>Calle Uruguay<br>Hato Rey, P.R. 00918 | Personal Services (Consulting) | 1-18-80 | 125.00 |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| L. Villamon<br>Calle Genova<br>Guaynabo, P.R. 00657 | Sign Painting: Campaign HQs | 1-18-80 | 300.00 |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Eulogio Martinez<br>Calle St. Ana #1653<br>Santurce, P.R. 00913 | Personal Services (Consulting) | 1-18-80 | 125.00 |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Luis Fortuno Moscoso<br>D1-19 Taylor<br>Guaynabo, P.R. 00657<br>Memo Entry - Exempt Portion | Three months rental: campaign HQs | 1-18-80 | 7,500.00<br>(2,250.00) |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| M.A.Q. Insurance Corporation<br>P.O. Box 2192<br>Old San Juan, P.R. 00903 Memo Entry - Exempt Portion | Theft Insurance: Campaign HQs | 1-18-80 | 305.00<br>(91.00) |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| M.A.Q. Insurance Corp.<br>P.O. Box 2192<br>Old San Juan, P.R. 00903 | Liability Insurance | 1-18-80 | 168.00 |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Tomas Yu<br>Ponce De Leon #1307<br>Santurce, P.R. 00913 | Parking area rental, three months: Campaign HQs | 1-18-80 | 2,000.00 |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) ..... Exempt portion | $ (2,341.00)<br>15,523.00 |
| TOTAL This Period (last page this line number only) ..... | $ |

SCHEDULE B-P
(Rev. September 1978)
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P



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

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

Name of Candidate or Committee in Full

Kennedy For President

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Fucile Associates, Inc.<br>Ashford Avenue<br>Condado, P.R. 00911 | Printing Costs | 1-18-80 | 2,000.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Express Print<br>P.O. Box 987<br>San Juan, P.R. 00936 | Printing Costs | 1-18-80 | 5,000.00 |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Lopito, Illeana, & Howie, Inc.<br>Concordia # 716<br>Miramar, P.R. 00907 | Radio advertising: Production costs | 1-18-80 | 5,000.00 |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) | $ 12,000.00 |
| TOTAL This Period (last page this line number only) | $ |

SCHEDULE B P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

Page 9 of 15 for LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Banco de Santander<br>San Juan, PR | Service charge | 2/80 | 4.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| SUBTOTAL of Expenditures This Page (optional) | | | $ 4.00 |
| TOTAL This Period (last page this line number only) | | | $ |

02040332679

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

200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P


LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Espampados Deportivos<br>Box T Guaynado.<br>Puerto Rico 00657 | Campaign materials | 2/4/80<br>2/7/80<br>2/12/80 | 600.00<br>600.00<br>74.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Ochoa Recording Studio<br>P.O. Box 3002<br>San Juan, PR 00936 | Recordings | 2/6/80 | 615.00 |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Guastela Film Productions, Inc.<br>G.P.O. Box U<br>San Juan, PR 00936 | Film | 2/6/80 | 1500.00 |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Lopito, Ileana & Howie, Inc.<br>Concordia 716<br>Miramar. PR 00907 | Ads | 2/20/80<br>2/20/80<br>2/28/80 | 12176.00<br>23790.00<br>10000.00 |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Jose E. Talavera<br>c/o Federation of Musicians<br>Canal Street 255<br>Santurce, PR 00901 | Orchestra | 2/12/80 | 1000.00 |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Gerd Buther<br>Box 8032<br>Santurce, PR 00910 | Photographer | 2/22/80 | 200.00 |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Dupont Plaza Hotel<br>Condado, PR 00901 | Room rent | 2/21/80 | 13000.00 |
| Memo Entry - Exempt Portion | | | (12,000.00) |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Interviewing Services, Inc.<br>Montebello St. Z2<br>Garden Hills, Guay Nabo, PR 00652<br>(See memo entry - following) | Polling | 2/28/80 | 500.00 |
| SUBTOTAL of Expenditures This Page (optional) ..... Exempt | | | $ (12,000.00)<br>64,055.00 |
| TOTAL This Period (last page this line number only) ..... | | | $ |

20403328

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

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| | | | |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Banco de Santander<br>San Juan, PR | Particulars of Expenditure<br>MEMO | Date (month, day, year) | Amount of each expenditure this period |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| SUBTOTAL of Expenditures This Page (optional) | | | $ |
| TOTAL This Period (last page this line number only) | | | $ |

32820040393

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

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>Banco de Santander<br>San Juan, PR | Service charge | 3/80 | 30.40 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| SUBTOTAL of Expenditures This Page (optional) | | | $ 30.40 |
| TOTAL This Period (last page this line number only) | | | $ |

9204032826

SCHEDULE B P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

Page 8 of 15 for LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>San Juan Bus Advertising<br>P.O. Box 1416<br>San Juan, PR 00903 (See memo(c)) | Advertising | 3/13/80 | 3300.00 |
| B. Full Name, Mailing Address and ZIP Code<br>Bus Posters Production<br>P.O. Box 1416<br>San Juan, PR 00903 (See memo(c)) | Advertising | 3/13/80 | 1655.00 |
| C. Full Name, Mailing Address and ZIP Code<br>Banco de Santander<br>San Juan, PR | MEMO | | |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| E. Full Name, Mailing Address and ZIP Code<br>Puerto Rico Telephone Co.<br>G.P.O. Box 998<br>San Juan, PR 00936 | Telephone<br>VOIDED CHECKS | 3/10/80 | (100.00)<br>(100.00) |
| F. Full Name, Mailing Address and ZIP Code<br>Lopito, Ileana, & Howie, Inc.<br>Concordia 716<br>Miramar, PR 00907 | Advertising<br>correction of amount | 3/13/80 | (16,500.00)<br>12,500.00 |
| G. Full Name, Mailing Address and ZIP Code<br>Radio Voz<br>Villa Fontana Park<br>Carolina, PR 00630 | Particulars of Expenditure<br>Advertising<br>VOIDED CHECK | Date (month, day, year)<br>3/15/80 | Amount of each expenditure this period<br>(850.00) |
| H. Full Name, Mailing Address and ZIP Code<br>WOLA Radio<br>Suite 1201 Darlington Bldg.<br>Rio Piedra, P 00925 | Particulars of Expenditure<br>Advertising<br>VOIDED CHECK | Date (month, day, year)<br>3/15/80 | Amount of each expenditure this period<br>(640.00) |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) | $ (735.00) |
| TOTAL This Period (last page this line number only) | $ |

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

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| F. Full Name, Mailing Address and ZIP Code<br>Banco Popular de Puerto Rico<br>San Juan, PR | Particulars of Expenditure<br>See memo entry Below | Date (month, day, year)<br>3/19/80<br>3/19/80<br>3/19/80 | Amount of each expenditure this period<br>3,000.00<br>3,000.00<br>3000.00 |
| G. Full Name, Mailing Address and ZIP Code<br>DHS Films, Inc.<br>David Sawyer<br>60 W. 55th Street<br>New York, NY 10019 | Particulars of Expenditure<br>Media | Date (month, day, year) | Amount of each expenditure this period<br>Memo |
| H. Full Name, Mailing Address and ZIP Code<br>Best Delivery Services<br>P O Box 30068<br>Rio Piedras, P.R. 00929 | Particulars of Expenditure | Date (month, day, year)<br>3/27/80 | Amount of each expenditure this period<br>130.00 |
| SUBTOTAL of Expenditures This Page (optional) | | | $ 9,130.50 |
| TOTAL This Period (last page this line number only) | | | $ |

32040333264

Schedule A-P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P


LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Puerto Rico Telephone Co.<br>G.P.O. Box 998<br>San Juan, PR 00936 | Telephone | 3/10/80 | 177.16<br>157.52 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Isla Grande Flying School<br>San Juan, PR | Air travel | 3/9/80 | 100.00 |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Lopito, Ileana & Howie, Inc.<br>Concordia 716<br>Miramar, PR 00907 | Advertisment | 3/4/80 | 4000.00 |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) | $4434.68 |
| TOTAL This Period (last page this line number only) | $ F |

28033203

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

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Banco de Santander<br>San Juan, Pr | Service charge | 4/80 | 15.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Lopito, Ileana & Howie, Inc.<br>Concordia 716<br>Miramar, PR 00907 | Media | 4/80 | 88,230.33 |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) | $ 88,245.33 |
| TOTAL This Period (last page this line number only) | $ |

2040033286

SCHEDULE B-P
September 1978
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

Page 12 of 15 for LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Bankers Club of Puerto Rico<br>G.P.O. Box 276<br>San Juan, PR 00910 | Fundraiser Reception | 4/1/80 | 2160.00 |
| **B. Full Name, Mailing Address and ZIP Code** | **Particulars of Expenditure** | **Date (month, day, year)** | **Amount of each expenditure this period** |
| Caribe Hilton<br>San Juan, PR | Room rental | 4/1/80 | 1906.38 |
| **C. Full Name, Mailing Address and ZIP Code** | **Particulars of Expenditure** | **Date (month, day, year)** | **Amount of each expenditure this period** |
| Rene Sonfiorenzo<br>San Juan, PR | Travel and Subsistence | 4/14/80 | 1000.00 |
| **D. Full Name, Mailing Address and ZIP Code** | **Particulars of Expenditure** | **Date (month, day, year)** | **Amount of each expenditure this period** |
| Ortus<br>San Juan, PR | Food expenses | 4/21/80 | 800.00 |
| **E. Full Name, Mailing Address and ZIP Code** | **Particulars of Expenditure** | **Date (month, day, year)** | **Amount of each expenditure this period** |
| Puerto Rico Telephone Co.<br>G.P.O. Box 998<br>San Juan, PR 00936 | Telephone | 4/22/80 | 334.32 |
| **F. Full Name, Mailing Address and ZIP Code** | **Particulars of Expenditure** | **Date (month, day, year)** | **Amount of each expenditure this period** |
| | | | |
| **G. Full Name, Mailing Address and ZIP Code** | **Particulars of Expenditure** | **Date (month, day, year)** | **Amount of each expenditure this period** |
| | | | |
| **H. Full Name, Mailing Address and ZIP Code** | **Particulars of Expenditure** | **Date (month, day, year)** | **Amount of each expenditure this period** |
| | | | |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) | $ 6200.70 |
| TOTAL This Period (last page this line number only) | $ |

15320403287

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

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Banco de Santander<br>San Juan, PR | Service charge | 5/80 | 3.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) | $ 3.00 |
| TOTAL This Period (last page this line number only) | $ |

13288032040

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

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P


LINE NUMBER _____

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Caso Travel Agency<br>Ensanada St 356<br>Caparra Heights PR 00920<br>(See memo entry) | Travel | 6/13/80 | 108.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| Banco de Santander<br>San Juan, PR | MEMO | | |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| | | | |

| | |
|---|---|
| SUBTOTAL of Expenditures This Page (optional) | $ 108.00 |
| TOTAL This Period (last page this line number only) | $ |

13032809

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

5200-52

# ITEMIZED EXPENDITURES

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

Supporting Lines 24a, 25a, 26a, 26b, and 27a of FEC Form 3P

LINE NUMBER 31 or 27

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

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

Name of Candidate or Committee in Full

KENNEDY FOR PRESIDENT COMMITTEE

| A. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
|---|---|---|---|
| Banco de Santander<br>San Juan, PR | Bank charge | 6/25/80 | 40.00 |
| B. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| C. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| D. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| E. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| F. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| G. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| H. Full Name, Mailing Address and ZIP Code | Particulars of Expenditure | Date (month, day, year) | Amount of each expenditure this period |
| SUBTOTAL of Expenditures This Page (optional) | | | $40.00 |
| TOTAL This Period (last page this line number only) | | | $192,045.61<br><14,341.00><br>Exempt Portion<br>Line 24 |

C00033290

2040

8204033329 1

**Graham & James**
1050 17th St., N.W., Suite 1200
Washington, D.C.

Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

8204033332 92

SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

81 APR 14 P2:31

April 14, 1981

MEMORANDUM

TO: The Commission

From: Charles N. Steele
General Counsel

SUBJECT: Request for Authorization to Issue Subpoenas for Deposition in MUR 1370

Attached are three subpoenas for deposition which the Office of General Counsel requests the Commission authorize and issue with respect to MUR 1370. The Commission has found reason to believe the respondent, Kennedy for President Committee ("KFP"), violated the reporting and disclosure provisions of the Federal Election Campaign Act in connection with the activities of its Puerto Rico affiliate in organizing a radio "marathon," and in tendering payment of $88,000, in cash, to one of its vendors.

The subpoenas are directed to the following individuals: Julio H. Morales, Administrative Officer of the advetising firm of Lopita, Ileana and Howie, Inc.; Miguel D. Lausell, Campaign Director of the Kennedy for President Committee-Puerto Rico; and Miguel A. Rivera, a KFP-Puerto Rico staff member. The Office of General Counsel believes oral examination of Miguel A. Rivera, who, according to documents and responses to interrogatories submitted by KFP, collected and made the $88,000 cash payment, is necessary to determine specifically the facts surrounding that payment, as well as the legality of the source of that cash. Similarly, the oral examination of Mr. Morales, an officer of the vendor which received the cash payment, is also necessary to obtain the aforementioned information. 1/

---

1/ A sworn affidavit of Mr. Morales was submitted by KFP in connection with this MUR.

9204033293

Finally, the Office of General Counsel believes the deposition of Miguel Lausell should also be taken, as he was the Campaign Director of KFP-Puerto Rico 2/ and therefore would probably be in the best position to explain the extent and nature of the Committee's role in the events that are the subject of this MUR, as well as the practices and procedures of the committee with respect to the receipt, deposit and expenditure of KFP-Puerto Rico campagin funds.

Recommendations

Authorize the subpoenas for deposition of Julio H. Morales, Miguel D. Lausell, and Miguel A. Rivera

Attachments

I. 3 Subpoenas for Deposition and Cover letters
II. Commission Authorization for Subpoenas

6204033294

2/ Mr. Lausell has also submitted an affidavit to the Commission in connection with MUR 1370.

(3)

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Miguel A. Rivera
Suite 1030
Banco Popular Center
Ponce de Leon Avenue
Hato Rey, Puerto Rico 00917

RE: MUR 1370

Dear Mr. Rivera:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 2:00 p.m. has been issued.

Please be advised that, as the deposition being taken as part of a Commission investigation, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission where, as here, no express written consent to that effect has been received by the parties who are the subject of the investigation.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition. In addition, if any special arrangements are necessary, such as the presence of a translator at the deposition, please so advise this office immediately.

Attachment I
(9 pages total)

6204033295

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission is paid $30.00, plus mileage at the rate of 22.5 cents per mile. A check made payable to you to cover this fee will be handed to you at the deposition.

Please confirm your scheduled appearance with Marsha Gentner on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Marsha Gentner, the attorney handling this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

8204033296

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

**Subpoena To Appear For Deposition Upon Oral Examination**

TO: Miguel A. Rivera
Suite 1030
Banco Popular Center
Ponce de Leon Avenue
Hato Rey, Puerto Rico 00917

RE: Matter Under Review 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3) and (4), you are hereby ordered to appear for deposition in connection with the Commission's investigation of possible violations of the Federal Election Campaign Act of 1971, as amended, by the following persons: Kennedy for President Committee.

Notice is hereby given that the deposition is to be taken at Conference Room, 3101 Federal Office Building, Chardon Avenue, Hato Rey, Puerto Rico, at 2:00 p.m. on April 29, 1981, and any and all dates adjourned to by the Commission.

WHEREFORE, the of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day of , 1981

Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033297

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

8204033298

CERTIFIED MAIL
RETURN RECIEPT REQUESTED

Julio Hector Morales
Administrative Officer
Lopita, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico 00907

RE: MUR 1370

Dear Mr. Morales:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 30, 1981 at 10:00 a.m. has been issued.

Please be advised that, as the deposition is being taken as part of a Commission investigation, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission where, as here, no express written consent to that effect has been received by the parties who are the subject of the investigation.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition. In addition, if any special arrangements are necessary, such as the presence of a translator at the deposition, please so advise this office immediately.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commisison is paid $30.00, plus mileage at the rate of 22.5 cents per mile. A check made payable to you to cover this fee will be handed to you at the deposition.

Please confirm your scheduled appearance with Marsha Gentner on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Marsha Gentner, the attorney handling this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

8204033332999

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

## Subpoena To Appear For Deposition Upon Oral Examination

TO: Julio Hector Morales
Administrative Officer
Lopita, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico 00907

RE: Matter Under Review 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3) and (4), you are hereby ordered to appear for deposition in connection with the Commission's investigation of possible violations of the Federal Election Campaign Act of 1971, as amended, by the following respondent: Kennedy for President Committee.

Notice is hereby given that the deposition is to be taken at Conference Room, 3101 Federal Office Building, Chardon Avenue, Hato Ray, Puerto Rico, at 10:00 a.m. on April 30, 1981, and any and all dates adjourned to by the Commission.

WHEREFORE, the of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day of 1981.

Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

0204033300

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Miguel D. Lausell
Campaign Director, Kennedy for
President Committee - Puerto Rico
Suite 1602
Banco Central y Economias
221 Ponce de Leon Avenue
Hato Rey, Puerto Rico 00917

RE: MUR 1370

Dear Mr. Lausell:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on April 29, 1981 at 10:00 a.m. has been issued.

Please be advised that, as the deposition is being taken as part of a Commission investigation, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) will apply. This section of the Act prohibits the making public of any investigation conducted by the Commission where, as here, no express written consent to that effect has been received by the parties who are the subject of the investigation.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition. In addition, if any special arrangements are necessary, such as the presence of a translator at the deposition, please so advise this office immediately.

6204033301

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission is paid $30.00, plus mileage at the rate of 22.5 cents per mile. A check made payable to you to cover this fee will be handed to you at the deposition.

Please confirm your scheduled appearance with Marsha Gentner on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions, please direct them to Marsha Gentner, the attorney handling this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Subpoena

8204033302

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

## Subpoena To Appear For Deposition Upon Oral Examination

TO: Miguel D. Lausell
Campaign Director, Kennedy for President Committee
Suite 1602
Banco Central y Economias
221 Ponce de Leon Avenue
Hato Rey, Puerto Rico 00917

RE: Matter Under Review 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3) and (4), you are hereby ordered to appear for deposition in connection with the Commission's investigation of possible violations of the Federal Election Campaign Act of 1971, as amended by the following persons: Kennedy for President Committee.

Notice is hereby given that the deposition is to be taken at the Conference Room, 3101 Federal Office Building, Chardon Avenue, Hato Rey, Puerto Rico, at 10:00 a.m. on April 29, 1981, and any and all dates adjourned to by the Commission.

WHEREFORE, the of the Federal Election Commission has hereunto set his hand at Washington, D.C., on this day of 1981.

Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033303

8204033304

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

8204033305

## AUTHORIZATION TO ISSUE SUBPOENAS

The Commission hereby authorizes the issuance of a subpoena for deposition to the following persons in connection with MUR 1370.

Julio Hector Morales
Administrative Officer
Lopita, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

Miguel D. Lausell
Suite 1602
Banco Central y Economias
221 Ponce de Leon Avenue
Hato Rey, Puerto Rico

Miguel A. Rivera
Suite 1030
Banco Popular Center
Ponce de Leon Avenue
Hato Rey, Puerto Rico

John W. McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

Attachment II

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**AUTHORIZATION TO ISSUE SUBPOENAS**

The Commission hereby authorizes the issuance of a subpoena for deposition to the following persons in connection with MUR 1370.

Julio Hector Morales
Administrative Officer
Lopita, Ileana and Howie, Inc.
Concordia 716
Miramar, Puerto Rico

Miguel D. Lausell
Suite 1602
Banco Central y Economias
221 Ponce de Leon Avenue
Hato Rey, Puerto Rico

Miguel A. Rivera
Suite 1030
Banco Popular Center
Ponce de Leon Avenue
Hato Rey, Puerto Rico

John W. McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

8204033306

MUR 1370 - Kentucky

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
William C. Oldaker

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | E19546 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY — POSTMARK: 14 1981

5. ADDRESS (Complete only if requested)

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

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-439

4-8-81

MUR 1370 - Kentucky

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
BK
Kennedy for Pres. Committee

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 025854 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

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

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-439

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 8, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Oldaker, Treasurer
Kennedy for President Committee
1050 17th Street, N.W.
Washington, D.C. 20036

RE: MUR 1370

Dear Mr. Oldaker:

On March 23, 1981, your responses on behalf of the Kennedy for President Committee ("Committee") to the interrogatories propounded in the Commission's February 25, 1981 subpoena to the Committee were received by this office. However, those responses did not include any reference to, and therefore failed to supply any information concerning, the inquiries contained in Commission Interrogatories F and G. In addition, although requested by the Commission, the Committee responses failed to identify the relevant report(s) with respect to the information submitted in partial response to Interrogatory E.

If the above omissions were inadvertent and due to an oversight by the Committee, please submit the requested information promptly to the Commission, but in no event later than five days after your receipt of this letter. On the other hand, if the Committee cannot or will not supply this information, we request that this be confirmed in writing by you on behalf of the Committee so that the Commission may determine if it will be necessary to take any further action concerning compliance with its subpoena.

Should you have any question or problems concerning the foregoing, please call Marsha Gentner, at 523-5071.

Sincerely,

Charles N. Steele
General Counsel

8204033308

Mathematics and Logic

6204033310

# BANCO DE SANTANDER - PUERTO RICO

BS PR

CONSERVAR ENERGIA ES AHORRAR
SU BANCO AMIGO DESEA QUE AHORRE - CONSERVE ENERGIA

KENNEDY FOR PRESIDENT P.R. 215
12502 22ND ST. N.W.
WASHINGTON D.C.

ACCOUNT NUMBER

AUG 29 80
STATEMENT DATE

PAGE 1

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bién y le apreciarán como cliente y amigo

FDIC

| CHECKS AND DEBITS | CREDITS | DATE | BALANCE |
|---|---|---|---|
| | | JUL 31 | 344.06 |

| NO. OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO. OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | NUMBER OF ENCLOSURES THIS PAR. |
|---|---|---|---|---|---|---|
| | .00 | | .00 | .00 | | |

KEY TO C - CERTIFIED CHECK
D - DEPOSITED ITEM RETURNED
R - RETURNED ITEM

FWNN2-00090-R0978

# BANCO DE SANTANDER - PUERTO RICO

SUCURSAL / BRANCH: Hato Rey

## CERTIFICACION DE CHEQUE

FECHA / DATE: June 13, 1980

CERTIFICACION NUM. / CERTIFICATION NO.: 21636

TITULO DE LA CUENTA / TITLE OF ACCOUNT: Kennedy for President - P.R.

NUM. DEL CHEQUE / CHECK NO.: ____ FECHA / DATED: 6/6/80

A FAVOR DE / ON BEHALF OF: Caso Travel Agency

EL CHEQUE DESCRITO HA SIDO CERTIFICADO HOY Y HEMOS CARGADO EN SU CUENTA NUM. / THE CHECK DESCRIBED HAS BEEN CERTIFIED TODAY AND WE HAVE DEBITED YOUR ACCOUNT NO.

LA SUMA DE $ / THE AMOUNT OF: 108.00

PREPARADO POR / PREPARED BY: K Rivera

FIRMA AUTORIZADA / AUTHORIZED SIGNATURE

ORIGINAL - PRUEBA Y TRANSITO

⑈ 0080305 1 ⑈ 69 ⑆00000 10800⑆

0 4 0 3 3

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0049-R0978

# BANCO DE SANTANDER - PUERTO RICO

DE DEBITO / OF DEBIT

UNIDAD / UNIT: Hato Rey

S CARGADO A SU CUENTA COMO SIGUE: / E DEBITED YOUR ACCOUNT AS FOLLOWS:

FECHA / DATE: June 25, 1980

| DESCRIPCION - DESCRIPTION | CANTIDAD - AMOUNT |
|---|---|
| Cheque fechado en Marzo 9, 1980 girado por El Meson Vasco A favor de Kennedy for President contra el x Banco Popular de P.R. x y devuelto por fondos insuficientes. Incluimos cheque | |
| TOTAL | $ 40.00 |

SANTANDER - PUERTO RICO JULY 25 1980 HATO REY

E A: Kennedy for President
12502 22nd St. N.W.
Washington D.C.

ZIP CODE

DEBITO-DEBIT

NUM. DE CUENTA / ACCOUNT NO.: 008-030511

FIRMA AUTORIZADA

⑈008 ⑆ - 71⑆000004000⑆

FWRIN1:00001-R0478

# BANCO DE SANTANDER-PUERTO RICO

BS PR

CONSERVAR ENERGIA ES AHORRAR
SU BANCO AMIGO DESEA QUE AHORRE - CONSERVE ENERGIA

ACCOUNT NUMBER ✓ 6 2 0 4 0 3 3 3 3 1 2

KENNEDY FOR PRESIDENT P.R. 215
12502 22ND ST. N.W.
WASHINGTON D.C.

Br 3773
Washington DC 20004

JUN 30 80
STATEMENT DATE

PAGE 1

En el Santander lo que cuenta es la gente. . ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales Le atenderán bien y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | CREDITS | DATE | BALANCE |
|---|---|---|---|
| | | MAY30 | 127.06 |
| 108.00C | 365.00 | JUN13 | 384.06 |
| 40.00M | | JUN25 | 344.06 |

| | | | | | |
|---|---|---|---|---|---|
| 2 | 148.00 | 1 | 365.00 | .00 | 2 2 |

23 de junio de 1980

Lcdo. Miguel Lausell
Suite 1601
Edificio Banco Central Y Economías
Ave. Ponce de León 221
Hato Rey, Puerto Rico 00919

Estimado Lcdo. Lausell:

Deseamos informarle que siguiendo instrucciones telefónicas del Sr. Michael Hill, confirmadas por cable por el Sr. William C. Oldaker, Treasurer Kennedy for President Committee Account, hemos procedido a congelar la cuenta corriente número [redacted] abierta bajo el nombre Kennedy for President P. R. que a la fecha tiene un balance de $384.06.

Hemos de agradecerle que nos devuelva firmada la copia que acompañamos.

Gracias por su atención,

Cordialmente,

Hiram Fernández
Vicepresidente-Auditor

HF:dl

0 2 0 4 0 3 3 3 3 1 3

HEMOS CARGADO A SU CUENTA COMO SIGUE
WE HAVE DEBITED YOUR ACCOUNT AS FOLLOWS:

Oct. 27, 1980

| DESCRIPCION - DESCRIPTION | CANTIDAD - AMOUNT |
|---|---|
| Cheque fechado en Marzo 9, 1980 girado por El Mesón Vasco A favor de Kennedy for President contra el Banco Popular de P.R. # y devuelto por fondos insuficientes. Incluimos cheque. | |
| | TOTAL $ 20.00 |

ENVIESE A:
MAIL TO: Kennedy for President
12502 22nd St. N.W.
Washington D.C.
ARCHIVO-FILE
ZIP CODE

NUM. DE CUENTA
ACCOUNT NO.

FIRMA AUTORIZADA
AUTHORIZED SIGNATURE

0204033311 4

# Kennedy '80

1250 22nd Street N.W.
Washington, D.C. 20037
202-861-6000

June 18, 1980

Banco De Santander
GPO Box 2589
San Juan, Puerto Rico 00936

Attention: Rosaura Morales

Dear Ms. Rosaura:

This is to confirm the telephone conversation between yourself and Raquel Frankel on June 18, 1980 regarding account [# 008-[illegible] 11-] (Kennedy For President-P.R.)

It is our request that, effective immediately, you accept no more deposits to; and honor no more checks drawn on our account at your bank.

Micheal Hill, Regional State Accounts Coordinator for our campaign, will contact you furter regarding any additional steps that may be neccessary to close out our account. If you have any questions about this or any other manner regarding our account, please contact him at our national headquarters:

Kennedy for President Committee
1250 22nd Street, N.W.
Washington, D.C. 20037
(202) 861-6032

Thank you for your cooperation.

Sincerely,

William C. Oldaker
Treasurer

B.S.P.R.
HATO REY
FOMENTO
JUN [illegible]

0 2 0 4 0 3 3 3 3 1 5

A copy of our report is filed with the Federal Election Co[illegible] and is available for purchase from the Federal Election Commission, Washington, D.C. 20463

23 de junio de 1980

Lcdo. Miguel Lausell
Suite 1601
Edificio Banco Central Y Economías
Ave. Ponce de León 221
Hato Rey, Puerto Rico 00919

Estimado Lcdo. Lausell:

Deseamos informarle que siguiendo instrucciones telefónicas del Sr. Michael Hill, confirmadas por cable por el Sr. William C. Oldaker, Treasurer Kennedy for President Committee Account, hemos procedido a congelar la cuenta corriente número [illegible]-030[illegible] abierta bajo el nombre Kennedy for President P. R. que a la fecha tiene un balance de $384.06.

Hemos de agradecerle que nos devuelva firmada la copia que acompañamos.

Gracias por su atención,

Cordialmente,

Hiram Fernández
Vicepresidente-Auditor

HF:dl

0 2 0 4 0 3 3 3 3 1 6

Att: Mr. Willian C. Oldaker, Treasury Kennedy for President Committee

Re: your cable 6/18/80 regarding account No. [redacted]

unable to comply with your instructions due to the fact that the person authorized to sign and handle the account is Mr. Miguel Lausell

0204033317

# BANCO CREDITO Y AHORRO PONCEÑO

## DDA MASTER FILE CHANGE

Branch Name

Mo. Day Yr.

Effective Date

ACCOUNT NUMBER

T/C 03 — CHANGE NAME TO:

Kennedy for President P. R.

T/C 04 — CHANGE ADDRESS TO:

1250 22nd. St. N. W.

Washington D. C.

T/C 04 — 2

T/C 95 — CHANGE SHORT NAME TO:

CHECK THE APPLICABLE BOX:

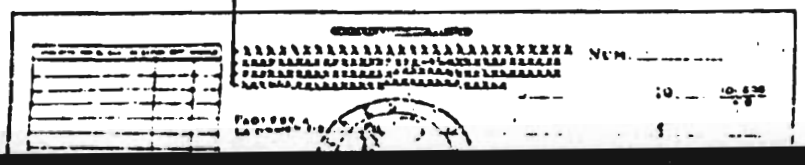
☐ Regular Pocket Checks ☐ Plan Económico Checks

CHANGE NAME TO:

CHANGE ADDRESS TO:

☐ Regular 3 in 1 Checks ☐ Special Format Checks (Submit Sample)

NAME OR TITLE OF ACCOUNT-3 IN 1 CHECKS



# BANCO CREDITO Y AHORRO PONCEÑO

## DDA - MASTER FILE CHANGE

Hato Rey
Branch Name

Mo. Day Yr.
0 6 1 8 8 0
Effective Date

1 4
ACCOUNT NUMBER

T/C 03 (10) CHANGE NAME TO: 0 (12) Kennedy for President P. R. (41)

T/C 04 (10) CHANGE ADDRESS TO: 1 (12) 1250 22nd St. N.W. (41) Washington D.C.

T/C 04 (10) 2 (12)

T/C 05 (10) CHANGE SHORT NAME TO: (12)

02040333

CHECK THE APPLICABLE BOX:

☐ Regular Pocket Checks ☐ Plan Economico Checks

CHANGE NAME TO:

CHANGE ADDRESS TO:

☐ Regular 3 in 1 Checks ☐ Special Format Checks (Submit Sample)

NAME OR TITLE OF ACCOUNT-3 IN 1 CHECKS

NUM. _____ 19 __

BANCO CRÉDITO Y AHORRO PONCEÑO

## SOLICITUD PARA CAMBIO DE DIRECCIÓN POSTAL

6-18-80

BANCO CREDITO Y AHORRO PONCEÑO

Sucursal de 45

Señores:

Notifico a ustedes para los fines correspondientes que hasta nuevo aviso, mi nueva dirección postal es la siguiente:

Reading for Student P.O.
1250 22nd St N W
Washington D C

MUY ATENTAMENTE,

NOMBRE COMPLETO DEL CLIENTE

FIRMA SEGUN REGISTRADA EN EL BANCO

NUMERO DE LA CUENTA

NUMERO DEL PRESTAMO

patricia

2040333320

BADERPR 3450062
JUN 18 AST1405

BADERPR 3450062
ZCZC JPA447 VIA ITT QI8281 4-0325593170
PDSJ CO UIAX 071
TDMT WASHINGTON DC 71/66 18 1254P EST

BANCO DE SANTANDER, ATTN ROSAURA MORALES
GPO BOX 2559
SANJUAN00936

IN CONFIRMATION OF THE TELEPHONE CONVERSATION BETWEEN YOURSELF AND RAQUEL FRANKEL ON JUNE 18 1960 IT IS OUR REQUEST THAT EFFECTIVE IMMEDIATELY YOU ACCEPT NO MORE DEPOSITS TO: AND HONOR NO MORE CHECKS DRAWN ON OUR ACCOUNT AZ YOUR BANK CONFIRMATION BY LETTER WILL FOLLOW
WILLIAM C OLDAKER TREASURER KENNEDY FOR PRESIDENT COMMITTEE ACCOUNT NO 630511

COL 2559 SANJUAN00936 18 1960 008-630511

Bl. 380

BADERPR 3450062,,,,,

8204033322

# BANCO CRÉDITO Y AHORRO PONCEÑO

## SOLICITUD PARA CAMBIO DE DIRECCION POSTAL

4-15-19 80

BANCO CREDITO Y AHORRO PONCEÑO
Sucursal de MC.

Señores:

Notifico a ustedes para los fines correspondientes que hasta nuevo aviso, mi nueva dirección postal es la siguiente:

1250 - 22nd Street
Washington, D.C.
20037
Att: Rachael Wicks
Tel: 202
<1.1. 0000
por teléfono

MUY ATENTAMENTE,

Kenneth Feinberg
NOMBRE COMPLETO DEL CLIENTE

FIRMA SEGUN REGISTRADA EN EL BANCO

NUMERO DE LA CUENTA

NUMERO DEL PRESTAMO

0204033333323

# B[redacted]O CREDITO Y AHORRO P[redacted]O

## DDA - MASTER FILE CHANGE

Kato Key
Branch Name

Mo. Day Yr.
0 8 2 5 8 0
Effective Date

1 4
ACCOUNT NUMBER

T/C 03 — CHANGE NAME TO:
10 12 41
Kennedy for Presidents P. R.

T/C 04 — CHANGE ADDRESS TO:
10 12 41
1 Att. Michael Hill
1250 2nd. Street

T/C 04 — 
10 12
2 Washington D. C. 20037

T/C 05 — CHANGE SHORT NAME TO:
10 12

CHECK THE APPLICABLE BOX:

☐ Regular Pocket Checks ☐ Plan Económico Checks

CHANGE NAME TO:

CHANGE ADDRESS TO:

☐ Regular 3 in 1 Checks ☐ Special Format Checks (Submit Sample)

NAME OR TITLE OF ACCOUNT-3 IN 1 CHECKS

6204033

MIGUEL D. LAUSELL
LAW OFFICES
SUITE 1601 BANCO CENTRAL Y ECONOMIAS BLDG.
221 PONCE DE LEON AVENUE
HATO REY, PUERTO RICO 00918

MIGUEL D. LAUSELL
PORFIRIO BONET CARDONA
LUIS F. HERNANDEZ
VICTOR R. UMPIERRE
RAFAEL MARXUACH DEL TORO
OF COUNSEL

TELEPHONE: AREA CODE 809
754-8078 -
758-6017
TELEX: 385-2852
CABLE: MILAU SAN JUAN

11 de abril de 1980

0204033325

Banco Santander de P.R.
Edificio Fomento
Hato Rey, P.R.

Atención: Sr. Morales

Estimado señor Morales:

Adjunto le incluyo cheques a ser depositados en la cuenta Núm. [illegible]-Kennedy for President, los cuales ascienden a la suma de $6,325.00.

Agradeceré de usted, ya que así nos lo exigen de Washington, que me envie una certificación de que esos cheques han sido depositados en dicha cuenta. Le incluyo una copia fotostática de cada uno de ellos de manera que usted las inicie y así sea más fácil.

Gracias por todas las atenciones que nos ha brindado en todas las ocasiones que hemos acudido a usted.

Muy atentamente,

Miguel D. Lausell

/lgr
anexos

File

I hereby certify that on this date we have credited the Account No. [006-03[illegible]] - Kennedy for President in the amount of $6,325.00 for checks deposited as described in Exhibit "A" attached hereto.

Sr. Morales:

La Oficina de Kennedy en Washington nos pide una certificación más o menos en éstos términos para constancia de todos los cheques depositados.

Agradeceremos nos la haga en el "stationery" del banco y nos inicie cada una de las páginas donde están fotocopiados los cheques para así incluirlas como Exhibit. Gracias mil.

8204033326

KENNEDY
For President
Box 13601 Cierra Heights
San Juan, Puerto Rico 00922

14 de febrero de 1980

A QUIEN PUEDA INTERESAR:

Re: Cuenta Número [redacted]
Kennedy Para Presidente

Por la presente le notifico que como Director de la Campaña del Senador Edward M. Kennedy en Puerto Rico, soy la única persona autorizada para firmar en la cuenta corriente de Kennedy Para Presidente.

De tener cualquier duda en relación a este asunto, no vacile en comunicarse conmigo.

Atentamente,

Miguel D. Lausell
Director de Campaña

8204033327

*Please Type or Print Clearly!*

This is an order blank for Three-to-the-page Checks. Follow these 4 steps when completing the blank.

1. Indicate the imprint you wish. (Usually this is name and address.)

2. Fill in the name and titles that should appear at signature line. If a second signature line is desired, indicate this.

3. List specifications. (Refer to catalog for complete details about checks and binders.)

4. Fill in complete mailing address if the imprint (#1) does not contain the mailing address. (A mailing address is not complete unless it has zip code.)

5. If remarks or special instructions are necessary, put on back. Write "See Back" across front.

**JOHN H. HARLAND COMPANY**
**BANK STATIONERS**

BS PR **BANCO DE SANTANDER –PUERTO RICO**
SUCURSAL AVE. MUÑOZ RIVERA
HATO REY, PUERTO RICO

⑆021502346⑆

3 **SPECIFICATIONS:** D. T. BOOKS: STYLE _____ QUANTITY _____
☐ ENDORSEMENT STAMP MONEY BAG # _____

| QUANTITY OF CHECKS | COLOR | Deposit Tickets |
|---|---|---|
| STYLE NUMBER See Catalog | ☐ BLUE | ☐ 60 |
| | ☐ GREEN | ☐ 90 |
| | ☐ YELLOW | ☐ No |
| | ☐ TAN | |
| | ☐ PINK | |
| | ☐ WHITE | |

BINDINGS & COVERS (Check One Box)

THREE RING
☐ Blue Hard Cover Refillable ☐ Brown Hard Cover Refillable
☐ Red Hard Cover Refillable ☐ Data Hard Cover Refillable
☐ Green Hard Cover Refillable ☐ No Cover

WIRELOCK
☐ Data Cover ☐ No Cover
☐ Blue Hard Cover
☐ Red Hard Cover
☐ Green Hard Cover
☐ Brown Hard Cover

DESKMASTER
☐ Blue
☐ Red
☐ Green
☐ Brown
☐ No Cover

INTERLEAF
☐ Brown Refillable
☐ Flex-Non-Refillable
☐ No Cover
☐ Data ☐ Blank

Comp
• Whe
the
• All

(2) MAILING A

DEPOSIT TICKET

NAME _____

ADDRESS _____

_____

19

CHECKS AND OTHER ITEMS ARE RECEIVED FOR DEPOSIT SUBJECT TO THE TERMS AND CONDITIONS OF THIS BANK'S COLLECTION AGREEMENT

CASH
CHECKS
TOTAL FROM OTHER SIDE
TOTAL

NEW AC

BS PR **BANCO DE SANTANDER –PUERTO RICO**
SUCURSAL AVE. MUÑOZ RIVERA
HATO REY, PUERTO RICO

⑆021502346⑆

# BANCO CREDITO Y AHORRO PONCEÑO

## DDA - NEW ACCOUNT

Hato Rey
Branch Name

Mo. 01 Day 18 Yr. 80
Effective Date

ACCOUNT NUMBER

T/C: 010
SOCIAL SECURITY NUMBER:
TELEPHONE NUMBER:
OFFICER:
STAT: 0 C 2 0
DATE OPEN: 01 80
SHORT NAME: Kennedy for President

T/C: 02
NAME OR TITLE OF ACCOUNT: Kennedy for President

MAILING ADDRESS AND ZIP CODE:
Ave. Roosevelt
Hato Rey P.R. 00918

T/C: 02
T/C: 18
ZONE CODE: 000000 0918
T/C: 23
BANKAMERICARD NUMBER
T/C: 25
STANDARD INDUSTRIAL CODE: 00000
T/C: 28
E.L.A. CODE: 0000000000

CHECK THE APPLICABLE BOX:

☐ Regular Pocket Checks ☐ Plan Económico Checks

NAME OR TITLE OF ACCOUNT

ADDRESS TO BE PRINTED ON CHECKS

☐ Regular 3 in 1 Checks ☐ Special Format Checks (Submit Sample)

NAME OR TITLE OF ACCOUNT-3 IN 1 CHECKS

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

**Subpoena Duces Tecum to Produce Certain Documents**

TO: Mr. Ruben Rivera Collado, Manager
Banco de Santander-Puerto Rico, San Juan Branch
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

As the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), the Banco de Santander-Puerto Rico, San Juan Branch is hereby ordered to produce for inspection and copying the documents listed below. Production is to be made within fifteen (15) days of your receipt the Commission's certification that the requirements of the Financial Privacy Act of 1978 have been complied with by the agency, by sending the documents designated herein by certified mail, to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Marsha Gentner.

1. Copies of all bank statements covering the period from January 18, 1980 to the present for customer account number _____ (Kennedy for President Committee/Puerto Rico, Miguel Lausell, signator).

2. Copies of deposit slips and all other documents and materials (including, but not limited to letters, memoranda, transfer slips, money orders and checks made payable to the drawer of the account or to cash, and any other written notations) relating to any deposit or transfer of funds into account number _____ for the period from January 18, 1980 through the present.

5204033330

3. Copies of the front and back of all cancelled checks, drawn on account number [illegible] from the period of January 18, 1980 to present.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set his hand at the Office of the Commission, 1325 K Street, N.W., Washington, D.C. 20463, this 25th day of February, 1981.

JOHN WARREN McGARRY
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033331

WNN2-00120-R1278

# BANCO DE SANTANDER - PUERTO RICO

Hato Rey
SUCURSAL - BRANCH

## INFORME SOBRE CUENTA NUEVA
REPORT ON NEW ACCOUNT

Cuenta Num. Account No. 00P-030511

Nombre(s) Name Kennedy For President-PR

Fecha abierta Date Opened 1-18 1980

Dirección del Negocio Business address Ave Roosevelt 249

Teléfono del Negocio Business Telephone 754-1680 ✓ 754-0655 754-0665

Hato Rey PR Zip Code 00918

Residencia Residence address

Teléfono de la Residencia Residence Telephone

Zip Code

Clase de Organización: Kind of Organization

Corporación Corporation ____ Sociedad Partnership ____ Individual Individual ____ Otro Other ✓

Número de Seguro Social Social Security Number n/a

Rama de Negocio Kind of business Campaña Senador Kennedy - PR

Depósito Inicial $ Initial deposit $ 20,000 —

Instrucciones especiales Special Instructions n/a El Sr. Roque Bassols firmará at

Otras cuentas bancarias Other bank accounts n/a

Ultima cuenta con Last account with n/a

Motivo del cambio Reason for change n/a

Otras cuentas relacionadas con el negocio Other accounts related to the business

Cuenta solicitada por Account requested by Sr. Roque Bassols - Sr. Carlos Conde (Oficina Ejecutiva)

Presentado por Introduced by

Referencias References n/a n/a

Enviar estados a Mail statements to Ave Roosevelt 249 P Zip Code 00918

Cuenta aceptada por Account approved by

Método de Identificación Method of Identification

Tarjetas de firmas recibidas por Signature cards received by

Otra documentación recibida por Other documents received by

Oficial que verifica la documentación

(Contrato de cta. etc., Resolución Corporat cuerdo de "Trade Name" (Razón Social), Acuerdo de Sociedad, Acuerdo de cuenta conjunta. Documentos Legales, etc.)

Roque Bassols

PWNN2-00184-R0178

# BANCO DE SANTANDER - PUERTO RICO
## CONTRATO DE CUENTA CORRIENTE REGULAR

AL: BANCO DE SANTANDER-PUERTO RICO

1-18-80
Fecha

Sucursal de ~~Kennedy Ave Hato Rey~~

RE: Cuenta Denominada Kennedy Fee Corriente PR

**En consideración a que el Banco acepte y mantenga en sus libros la cuenta corriente arriba mencionada, el depositante acepta los siguientes términos y condiciones, los cuales son parte de las Reglas y Reglamentos del Banco, y que gobernarán la operación de dicha cuenta.**

**El Banco estará abierto para operaciones mercantiles en aquellos días y durante aquellas horas en que la Junta de Directores de tiempo en tiempo disponga.**

**Los depósitos serán recibidos sujetos a las disposiciones de la Ley de Bancos, los reglamentos promulgados bajo dicha ley, y las Reglas y Reglamentos adoptados por la Junta de Directores del Banco. Cada depositante al abrir una cuenta acuerda quedar obligado por el Reglamento Corporativo y las Reglas y Reglamentos del Banco y las futuras enmiendas o adiciones a estos, incluyendo aquellas que modifiquen la relación del depositante con el Banco según quedan descritas en este Contrato.**

**Los avisos a los depositantes, incluyéndose pero no limitándose a cualquier aviso de enmienda o adición a las Reglas y Reglamentos, que sean colocados en cada oficina del Banco se considerarán y serán para todos los propósitos notificación efectiva a cada depositante. Aviso a los depositantes también puede ser comunicado con diez (10) días de anticipación a la fecha de efectividad por correo ordinario a la última dirección del depositante según surja de los archivos del Banco.**

**Queda entendido que la cuenta, bien este activa o inactiva (una cuenta se considerará inactiva cuando no se haya hecho depósitos o se haya librado cheques contra ella por un período de un año) estará sujeta a los cargos por servicio y mantenimiento, incluyéndose mas no limitándose a cargos por el manejo de: cheques posfechados, cheques devueltos, cheques girados contra fondos no cobrados, órdenes para suspensión de pago, sobregiros, fotocopias de documentos en relación con la cuenta o estado de cuenta en fechas específicas fuera del manejo regular de la cuenta, que haya adoptado el banco y estén en vigor y a aquellos cargos que se adopten en el futuro. También aquí incluido está el cargo que se impondrá si los fondos en la cuenta son reducidos por debajo del balance mínimo que el Banco de tiempo en tiempo requiera. El Banco está autorizado a cargar a la cuenta del depositante los cargos por mantenimiento y servicio, y el Banco no será responsable en caso de que devuelva cheques u otras órdenes de pago por no haber fondos suficientes en la cuenta como resultado de haberse cargado a la misma los cargos por servicio y mantenimiento.**

**Al establecerse esta cuenta corriente regular, el banco asignará a la misma un número de identificación y el depositante se compromete a poner dicho número en todos y cada uno de los cheques girados y/o depositados, así como en todos y cada uno de los volantes de depósito, órdenes para la suspensión de pagos o cualquier otra comunicación relacionada con dicha cuenta. El Banco no asumirá responsabilidad por errores que ocurran al manejar cheques, volantes de depósitos, órdenes para la suspensión de pagos o cualquier otra comunicación relacionada con la cuenta cuando el depositante no indique en la misma el número asignado a su cuenta. El depositante verificará todos los cheques impresos y volantes de depósitos provistos por el Banco para asegurar que el nombre de la cuenta y el número de identificación estén correctamente impresos. La responsabilidad del Banco en caso de que exista un error en la impresión de los cheques o de los volantes de depósito estará limitada a proveer nuevos cheques y volantes de depósito correctamente impresos.**

**Al recibirse un depósito, el recibidor verificará únicamente la corrección de la porción en efectivo, quedando todas las demás partidas (el término partidas, incluye todos los documentos o instrumentos de cualquier clase, que puedan ser presentados a un banco para depositar en una cuenta, incluyendo mas no limitándose a cheques, giros, giros bancarios, "payable thru checks", cheques de viajero, aceptaciones bancarias (vencidas), certificados de depósito negociables (vencidos), cupones de bonos (vencidos), órdenes negociables para el retiro de fondos, cheques certificados, cheques oficiales y demás cheques bancarios) depositadas para ser verificadas en la unidad central de procesamiento que el Banco de tiempo en tiempo designe para tales propósitos y el depósito será debidamente ajustado en caso de que se descubran errores.**

**El Banco se reserva el derecho de rehusar el pago de cheques que se presenten el mismo día en que se hagan depósitos para cubrirlo o cuando no haya expirado el período de retención no incurriendo en responsabilidad al ejercer ese derecho y el pago de cualesquiera de dichos cheques no se entenderá como renuncia a ese derecho. Todos los instrumentos otorgados por el depositante o su agente autorizado podrán ser pagados por el Banco al portador, sin incurrir en responsabilidad alguna, si dicho instrumento es pagadero a la orden de persona ficticia, o que no existe y ese hecho era conocido por el depositante, su empleado u otro agente que suplió el nombre del beneficiario.**

**Los depósitos no se a... las cuentas de los clientes hasta después de las horas regulares de oficina el**

0 2 0 4 0 3 3 3 3 3 3

cuyo pago haya sido suspendido [illegible] Banco no será responsable en [illegible] de rehusar el pago de [illegible] pague cualquier partida cuyo pago haya sido suspendido si dic[illegible]o se hace debido a inadvertencia o acc[illegible]mente; y tampoco será responsable al por dicho pago, otros cheques girados por el depositante son devueltos por falta de fondos. Toda suspensión de pago se considerará en vigor por un período de sesenta días, pero podrá renovarse la suspensión de pago, a solicitud expresa por escrito del librador, por períodos adicionales. Ninguna suspensión de pago o revocación de suspensión de pago se considerará que es válida, a menos que la misma se haga por escrito y sea entregada al Banco. El Banco no estará obligado a aceptar ninguna orden de suspensión de pago de un cheque certificado, cheque de gerente, giro bancario o partida similar.

El Banco no será responsable por la certificación o pago por error, inadvertencia, negligencia o descuido de cheques posfechados. El depositante se obliga a inmediatamente notificar al Banco por escrito la emisión de cheques posfechados describiendo en detalle dichos cheques. La omisión de notificar al Banco con anterioridad a que el cheque sea presentado al cobro, relevará al Banco de cualquier responsabilidad por no rehusar el pago debido a la fecha del mismo.

El suscribiente y cada uno de ellos autoriza expresamente al Banco a aplicar al pago de cualquier obligación del suscribiente con el Banco, sea esta absoluta o contingente, ahora existente o que surja posteriormente, vencida o por vencer, garantizada o no garantizada, mancomunada o solidaria, cualquier suma de dinero en depósito en esta cuenta o en cualquier otra cuenta perteneciente al suscribiente o a cualquiera de ellos, entendiéndose que la omisión o demora en el ejercicio de este derecho por parte del Banco, no alterará, modificará, ni constituirá una renuncia de tal derecho. El Banco no será responsable por devolver partidas cuando la insuficiencia de fondos en la cuenta del depositante se debe a la realización del cargo o cargos anteriormente mencionados. Se acuerda y queda entendido además que cualquier obligación del suscribiente o cualquiera de ellos con el Banco se considerará vencida al emitirse una orden de embargo contra el suscribiente o cualquiera de ellos y el Banco puede aplicar lo depositado en esta cuenta o en cualquiera otra cuenta, para el pago de dicha obligación.

De sobregirarse la cuenta, en adición a los cargos provistos en los reglamentos, el Banco cobrará intereses sobre el sobregiro al interés máximo legalmente permitido hasta que se pague completamente el sobregiro. No obstante lo anterior, en el caso de corporaciones cubiertas por las disposiciones de 14 L.P.R.A. 2206, el Banco podrá cobrar intereses más altos de acuerdo con las tasas que el Banco fije de tiempo en tiempo a través de reglamentos.

El depositante girará todos sus cheques contra esta cuenta, solamente contra la oficina del Banco en donde la cuenta está abierta y releva al Banco de cualquier responsabilidad por rehusar el pago de cheques que no figuren girados contra dicha oficina.

La responsabilidad del depositante, como endosante de cheques certificados a solicitud del Banco, no será relevada hasta tanto sea pagado el cheque.

En caso en que al Banco se le presente al cobro un cheque no fechado, el Banco queda autorizado, pero no obligado, a llenarle a su entera discreción la fecha del día en que se presenta o cualquier fecha anterior y podrá considerar el cheque para todos los propósitos como así fechado.

El Banco queda autorizado para enviar por correo ordinario todos los estados de cuenta, cheques cancelados y demás comprobantes a la última dirección del depositante de acuerdo con los archivos del Banco. El depositante inmediatamente examinará el estado de cuentas, cheques cancelados y demás comprobantes remitidos por el Banco y notificará cualquier error al Banco. Si el depositante no notifica al Banco la existencia de un error dentro de un término de diez (10) días a partir de la fecha del envío por correo del estado de cuentas, dicho estado de cuentas será considerado como correcto y los cheques y demás valores serán considerados genuinos. El depositante releva al Banco de cualquier responsabilidad hacia él por asumir el Banco la corrección de dicho estado de cuentas, si el error no es notificado dentro del período de diez días antes mencionado. Cualquier reclamación por el depositante que envuelva un error reflejado en el estado de cuentas, quedará renunciada y prescrita si no es notificada al Banco y por escrito antes de transcurrir ciento veinte (120) días de la fecha del envío del estado de cuentas por correo. Adicionalmente, cualquier causa de acción que surja bajo o se derive de este contrato prescribirá si la misma no es reclamada antes de cumplirse un año.

Si el Banco recibe una citación, emplazamiento, orden, entredicho, ejecución, embargo, gravamen o notificación (aquí designado "requerimiento judicial") el cual en la opinión del Banco afecta los fondos depositados en esta cuenta, el Banco puede, a su opción y sin incurrir en responsabilidad alguna, rehusar cumplir con órdenes de pago o de retiro de fondos de esta cuenta, reteniendo el balance en ella hasta que el requerimiento judicial haya sido dispuesto a satisfacción del Banco. El depositante se obliga a reembolsar al Banco todos los gastos que éste incurra por razón del requerimiento judicial tan pronto sea notificado por el Banco.

El Banco puede cerrar esta cuenta en cualquier momento y entregar el balance de los fondos al depositante, previo aviso de cinco días laborables bancarios de la intención de así hacerlo, y el Banco no será responsable por rehusar el pago de cualquier partida girada contra esta cuenta y presentada para pago con posterioridad a la entrega de los fondos o cierre de la cuenta. El Banco podrá rehusarse a gestionar el cobro de cualquier partida o partidas depositadas en esta cuenta después de haber enviado o dado el aviso de terminación enviando dichas partidas al depositante dentro de un plazo de cuarenta y ocho (48) horas.

Dirección:

_____

_____

_____

Firma(s) del Depositante

_____

o de los Depositantes _____

_____

_____

8 2 0 4 0 3 3 3 3 3 4

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 12, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ruben Rivera Collado
Banco de Santander-Puerto Rico,
San Juan Branch
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

RE: MUR 1370

Dear Mr. Collado:

Enclosed is a subpoena for the production of certain documents issued by the Federal Election Commission in connection with its investigation of MUR

The documents requested must be sent by certified mail to the address specified in the subpoena within fifteen days of your receipt of the Commission's certification that the provisions of the Financial Privacy Act of 1978 have been complied with by the agency. As required by section 1115 of the Financial Privacy Act of 1978, the Commission will reimburse the bank for the reasonable costs incurred a complying with this subpoena

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits any person from making public the fact of "any notification or investigation" by the Commission unless the respondent instructs the Commission, in writing, to make the investigation public. No such written permission has been received in this matter.

If you have any questions, please contact Ms. Marsha Gentner, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

0204033335

# BANCO DE SANTANDER-PUERTO RICO

BS PR

CON SUS CUENTAS DE AHORRO COMPLETE
ESTE NUEVO AÑO LAS DESEA EL BANCO AMIGO

ACCOUNT NUMBER

KENNELY FOR PRESIDENT P S 215..
AVE. ROOSEVELT
PUTO REY P R CCSLE

JAN 30 80
STATEMENT DATE

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | | CREDITS | DATE | BALANCE |
|---|---|---|---|---|
| | | | BALANCE | .00 |
| | | 20,000.00 | JAN 21 | 20,000.00 |
| [illegible] | 1,500.00 | | JAN 21 | 7,500.00 |
| 300.00 | 2,000.00 | | JAN 27 | 5,2[illegible] |
| [illegible] | 400.00 | | | |
| [illegible] | | | JAN 29 | 4,602.00 |
| [illegible] | | | JAN 30 | 399. - |
| [illegible] | 6.00 | | JAN 30 | 4,396.00 |
| [illegible] | 5,000.00 | 10,000.00 | JAN 30 | 9,471.00 |

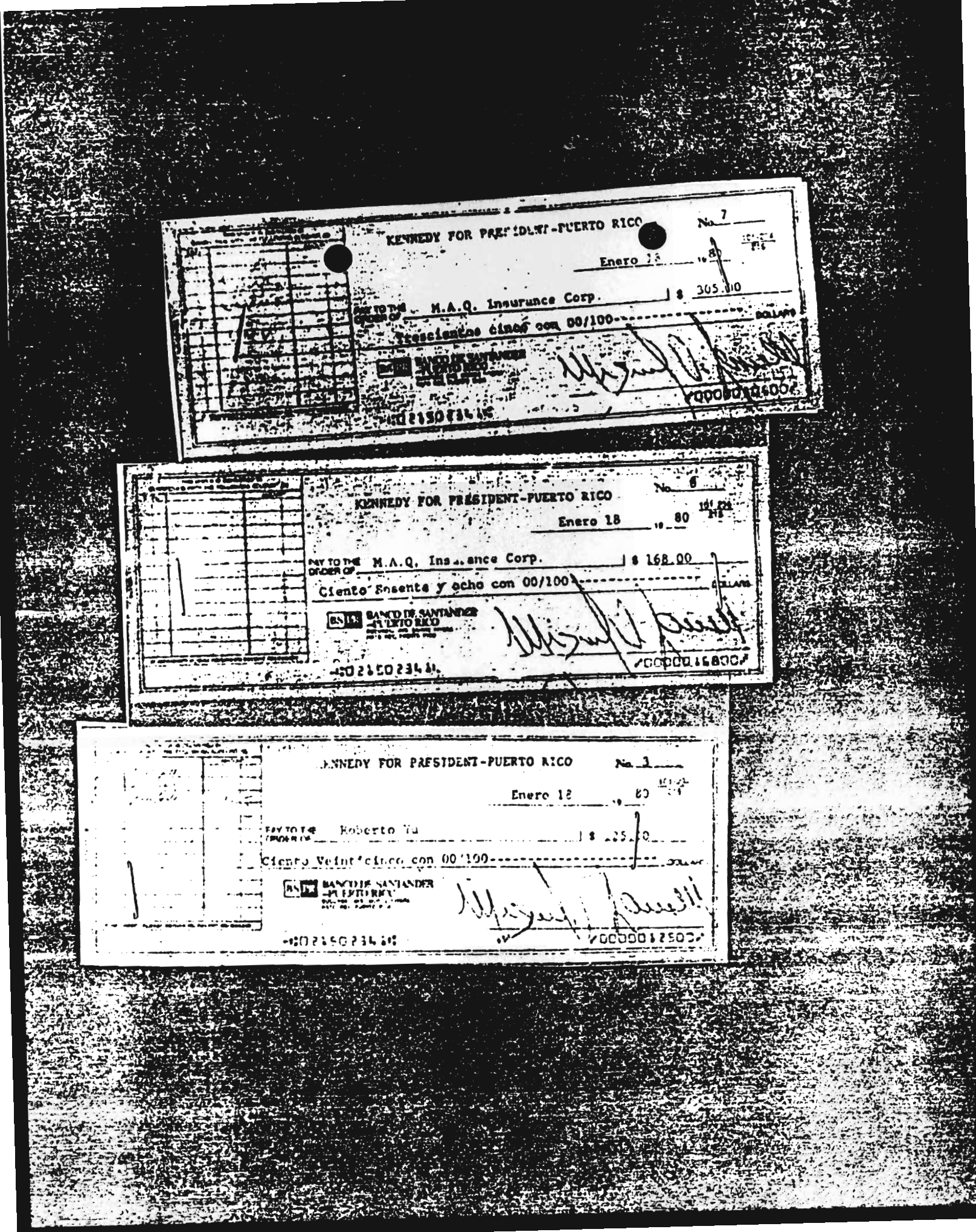
| NO OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | NUMBER OF ENCLOSURES THIS DATE |
|---|---|---|---|---|---|---|
| 5 | 20,529.00 | 2 | 30,000.00 | .00 | 5 | 7 |

KEY TO SYMBOLS

C - CERTIFIED CHECK
D - DEPOSITED ITEM RETURNED
E - ERROR CORRECTION
F - FEE FOR CHECKS PAID
I - INTEREST ON OVERDRAFT
L - LIST OF CHECKS
M - MEMO
R - RETURNED ITEM
S - SERVICE CHARGES
O - OVERDRAFT

4

0204033336



KENNEDY FOR PRESIDENT-PUERTO RICO No. 7

Enero 18 19 80

PAY TO THE ORDER OF M.A.Q. Insurance Corp. $ 305.00

Trescientos cinco con 00/100 DOLLARS

BANCO DE SANTANDER PUERTO RICO

⑆021502346⑆ ⑈000030500⑈

KENNEDY FOR PRESIDENT-PUERTO RICO No. 6

Enero 18 19 80

PAY TO THE ORDER OF M.A.Q. Insurance Corp. $ 168.00

Ciento Sesenta y ocho con 00/100 DOLLARS

BANCO DE SANTANDER PUERTO RICO

⑆021502346⑆ ⑈000016800⑈

KENNEDY FOR PRESIDENT-PUERTO RICO No. 3

Enero 18 19 80

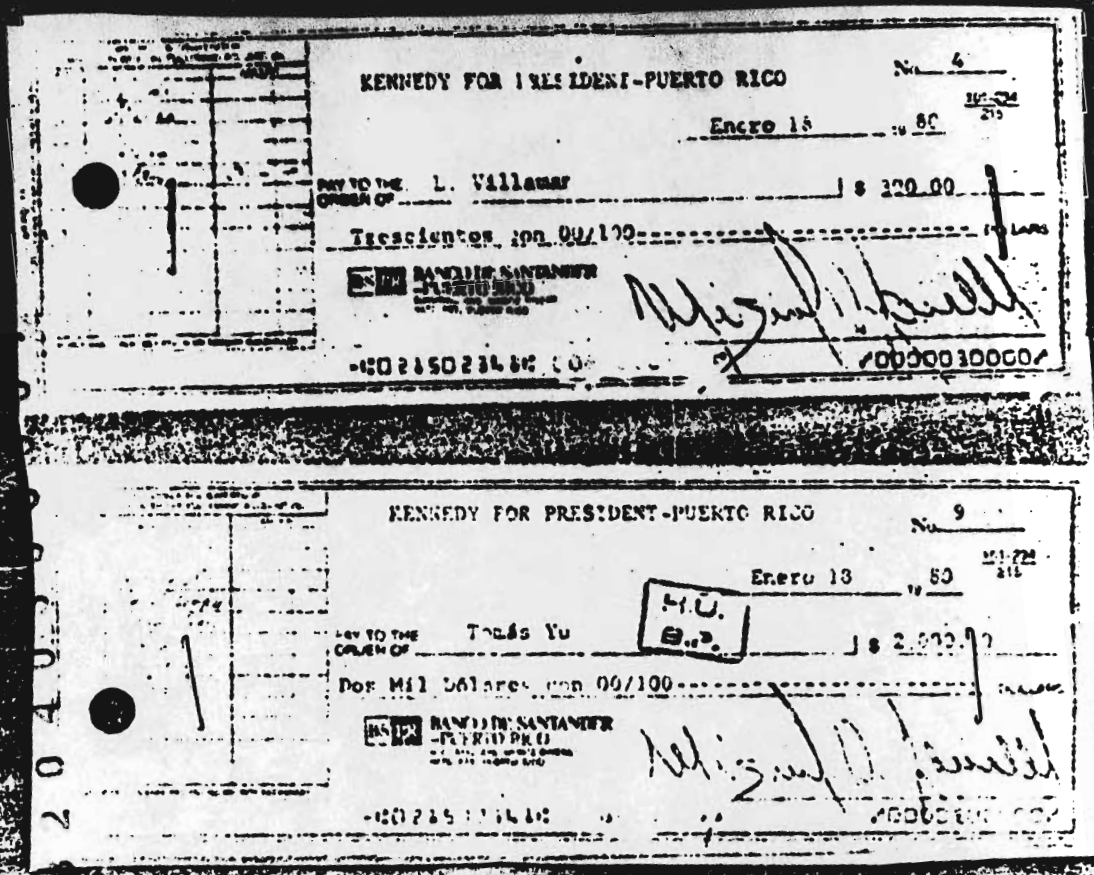
PAY TO THE ORDER OF Roberto Ta $ 25.00

Ciento Veinticinco con 00/100 DOLLARS

BANCO DE SANTANDER PUERTO RICO

⑆021502346⑆ ⑈000012500⑈

PRESIDENT FOR PRESIDENT - PUERTO RICO
Marzo 18
$ 125.00
Ciento Veinticinco con 00/100
Eduardo Martinez
BANCO DE SANTANDER PUERTO RICO
Cinco Mil Dólares con 00/100
BANCO DE SANTANDER PUERTO RICO



KENNEDY FOR PRESIDENT-PUERTO RICO

No. 4

Enero 15 '60

PAY TO THE ORDER OF L. Villamar $ 300.00

Trescientos con 00/100

BANCO DE SANTANDER PUERTO RICO

⑆021502346⑆ 10

⑈00000300⑈

KENNEDY FOR PRESIDENT-PUERTO RICO

No. 9

Enero 13 '60

H.U. B...

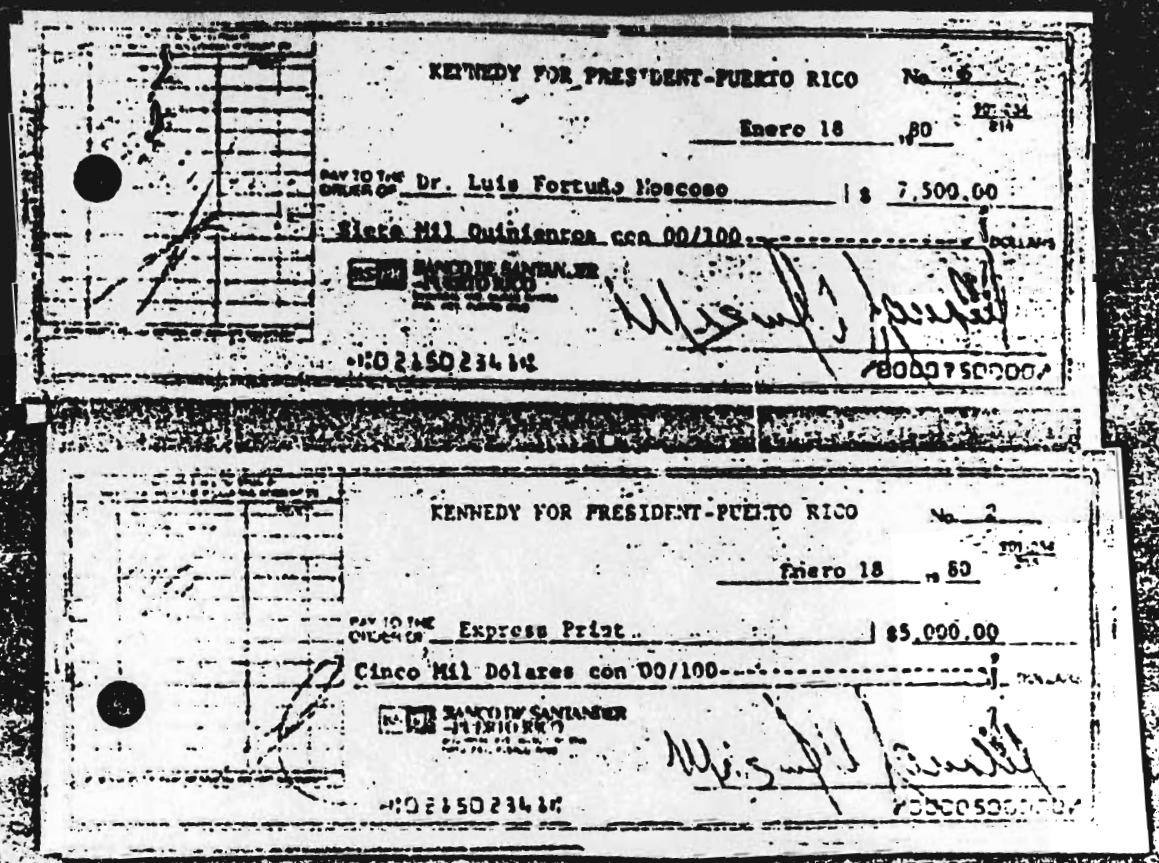
PAY TO THE ORDER OF Tomás Yu $ 2,000.00

Dos Mil Dólares con 00/100

BANCO DE SANTANDER PUERTO RICO

⑆021502346⑆ 10

⑈00000200⑈



KENNEDY FOR PRESIDENT-PUERTO RICO No. 6

Enero 18 80

PAY TO THE ORDER OF Dr. Luis Fortuño Moscoso | $ 7,500.00

Siete Mil Quinientos con 00/100 DOLLARS

BANCO DE SANTANDER PUERTO RICO

⑆021502341⑆ 0007500000

KENNEDY FOR PRESIDENT-PUERTO RICO No. 2

Enero 18 80

PAY TO THE ORDER OF Express Print | $5,000.00

Cinco Mil Dólares con 00/100 DOLLARS

BANCO DE SANTANDER PUERTO RICO

⑆021502341⑆ 0005000000

# BANCO DE SANTANDER-PUERTO RICO

BS PR

CUE SUS DESEOS SE VEAN CUMPLIDOS EN
ESTE NUEVO AÑO LES DESEA, SU BANCO AMIGO

ACCOUNT NUMBER 620403533341

KENNEDY
APARTADO 11661 CAPARRA
HEIGHTS SAN JUAN P R

215

FEB 29 80
STATEMENT DATE

PAGE 1

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

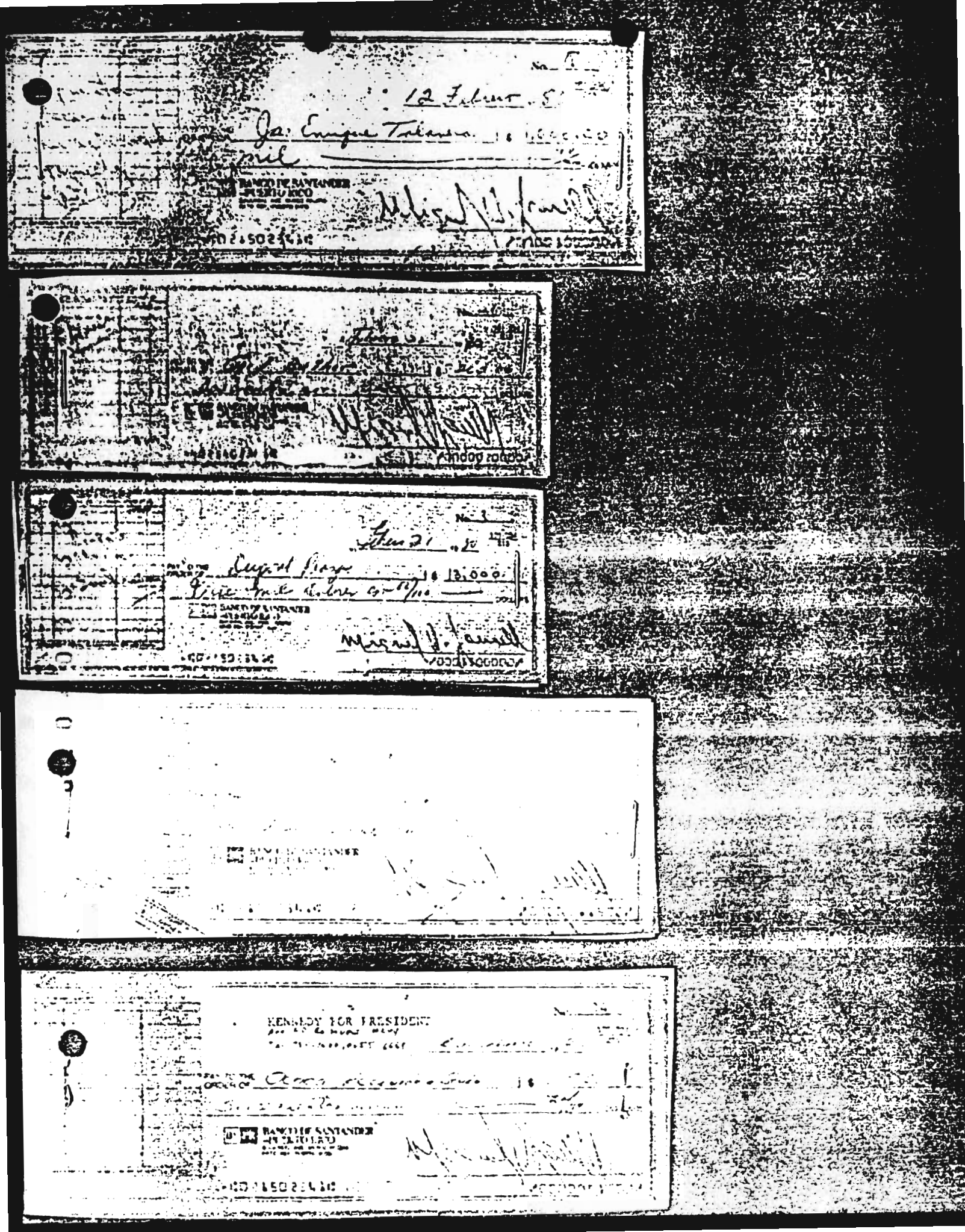
| CHECKS AND DEBITS | | CREDITS | DATE | BALANCE |
|---|---|---|---|---|
| | | | JAN 31 | 5,471.00 |
| 5,000.00 | | | FEB 04 | 471.00 |
| | | | 06 | 471.00 |
| 615.00 | 2,000.00 | | 08 | 856.00 |
| 1,500.00 | | 2,115.00 | 12 | 971.00 |
| 1,[illegible] | | | 13 | 471.00 |
| 74.00 | 600.00 | | | |
| 600.00 | 2,115.00 | | 14 | 2,082.00 |
| | | 45,670.00 | 20 | 47,752.00 |
| 500.00 | 12,176.00 | | | |
| 23,790.00 | | | 21 | 11,286.00 |
| 200.00 | | | 26 | 11,086.00 |
| 13,[illegible] | | | 27 | 1,914.00 |
| 1,000.00 | | | 27 | 914.00 |
| | | 1,000.00 | 29 | [illegible] |
| [illegible] | 1,[illegible] | | 24 | [illegible] |

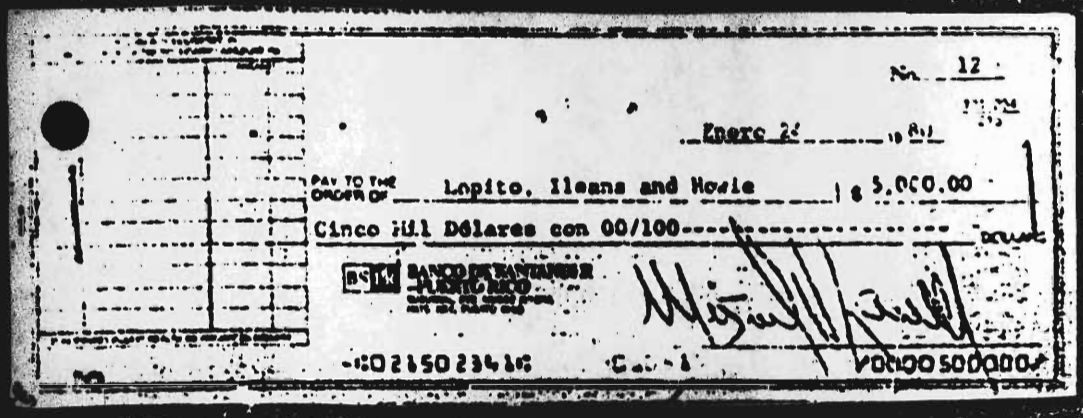
| NO OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | THIS YEAR |
|---|---|---|---|---|---|---|
| 14 | 63,175.00 | 4 | 53,765.00 | 3.00 | 14 | 14 |

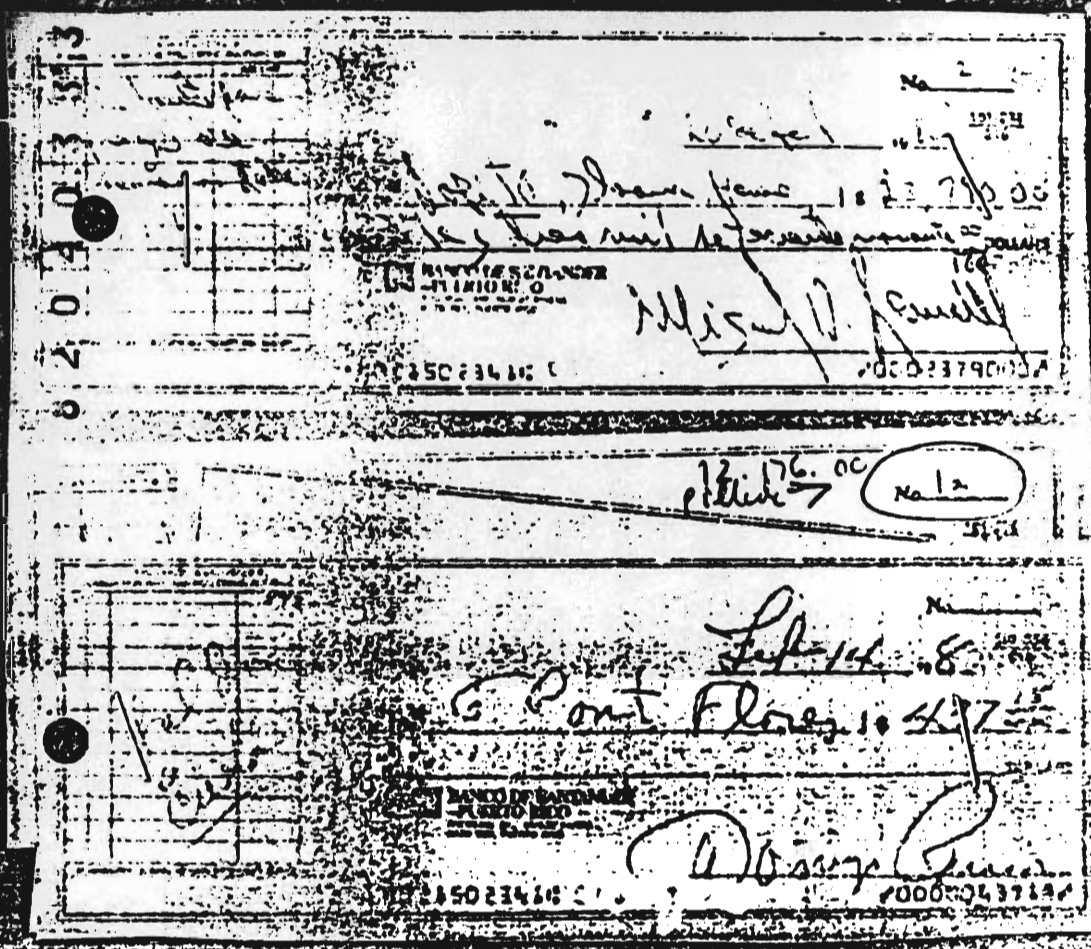
KEY TO SYMBOLS

C - CERTIFIED CHECK
D - DEPOSITED ITEM RETURNED
E - ERROR CORRECTION
F - [illegible] CHECKS PAID
I - INTEREST ON OVERDRAFT
L - LIST OF CHECKS
M - MEMO
R - RETURNED ITEM
S - SERVICE CHARGES
O - OVERDRAFT

(11)




No. 12
Enero 2[illegible]
PAY TO THE ORDER OF Lopito, Ileana and Howie
$ 5,000.00
Cinco Mil Dólares con 00/100
BANCO DE SANTANDER PUERTO RICO


BANCO DE SANTANDER PUERTO RICO
Feb 14 '86
Ground Floor

Olympia Mills
7 de febrero de 80
No 11
No 13
BANCO DE SANTANDER
PUERTO RICO

# BANCO DE SANTANDER-PUERTO RICO

BS PR

ACCOUNT NUMBER

KENNEDY
APARTADO 11661 CAPARRA
HEIGHTS SAN JUAN P R

STATEMENT DATE

PAG.

En el Santander lo que cuenta es la gente. ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | | CREDITS | DATE | BALANCE |
|---|---|---|---|---|
| | | | FEB29 | 81.00 |
| 6.55 ✓ | | | MAR03 ✓ | 74.45 |
| | | 14,500.00 | MAR04 ✓ | 14,574.45 |
| 10,000.00 ✓ | | | MAR05 ✓ | 4,574.45 |
| 4,000.00 ✓ | | | MAR06 | 574.45 |
| 429.00 ✓ | | 12,000.00 | MAR10 ✓ | 12,145.45 |
| 137.51 ✓ | 177.45 ✓ | | MAR12 ✓ | 11,830.49 |
| 1,055.00 | 3,300.00 | NO APARECE | | |
| 100.00 ✓ | 12,500.00 ✓ | | MAR13 ✓ | 16,815.49- |
| 10.45 | 10.45 | | MAR13 | 16,837.49- |
| | | 18,700.00 | MAR14 | 862.51 |
| 100.00 | | | MAR17 ✓ | 62.51 |
| 100.00 | 100.00 | 20,700.00 | | |
| 1,225.00 | 15,536.00 | | MAR18 ✓ | 6,901.51 |
| 5,000.00 | | 20.00 | MAR19 ✓ | 1.51 |
| (640.00 | ($50.00) | | MAR20 | 1,400.00- |
| 640.00 R) | 50.00 R) | | | |
| 6.00S | 6.00S | | MAR20 | 100.00- |
| | | 3,065.00 | MAR25 | 2,954.51 |
| 1,400.00 vehicle | | | MAR28 | 1,954.51 |
| 1,331.71 | | | MAR31 ✓ | 262.80 |
| 4.00S | 3.30S | | | |
| 9.10I | | | MAR31 | 240.20 |

| NO OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | THIS PAGE |
|---|---|---|---|---|---|---|
| 16 | 13,613.74 | 6 | 73,765.00 | 3.30 | 16 | 16 |

KEY TO SYMBOLS

C - CERTIFIED CHECK
D - DEPOSITED ITEM RETURNED
E - ERROR CORRECTION
F - FEE PER CHECKS PAID
I - INTEREST ON OVERDRAFT
L - LAST OF CHECKS
M - MEMO
R - RETURNED ITEM
S - SERVICE CHARGES
T - OVERDRAFT

PLEASE [illegible] THIS STATEMENT

(15)

24

May 24 '56

Pay to the order of Puerto Rico Tel. Co. $ 157.52

One hundred fifty seven 52/100 Dollars

BANCO DE SANTANDER PUERTO RICO

Memo 7SW-0655

---

No.

4 de Mayo '56

Pay to the order of Rosita Hevia y Hevia $ 4.000.00

Cuatro mil

BANCO DE SANTANDER PUERTO RICO

---

No.

10 Mayo '56

Pay to the order of Puerto Rico Tel. Co. $ 157.52

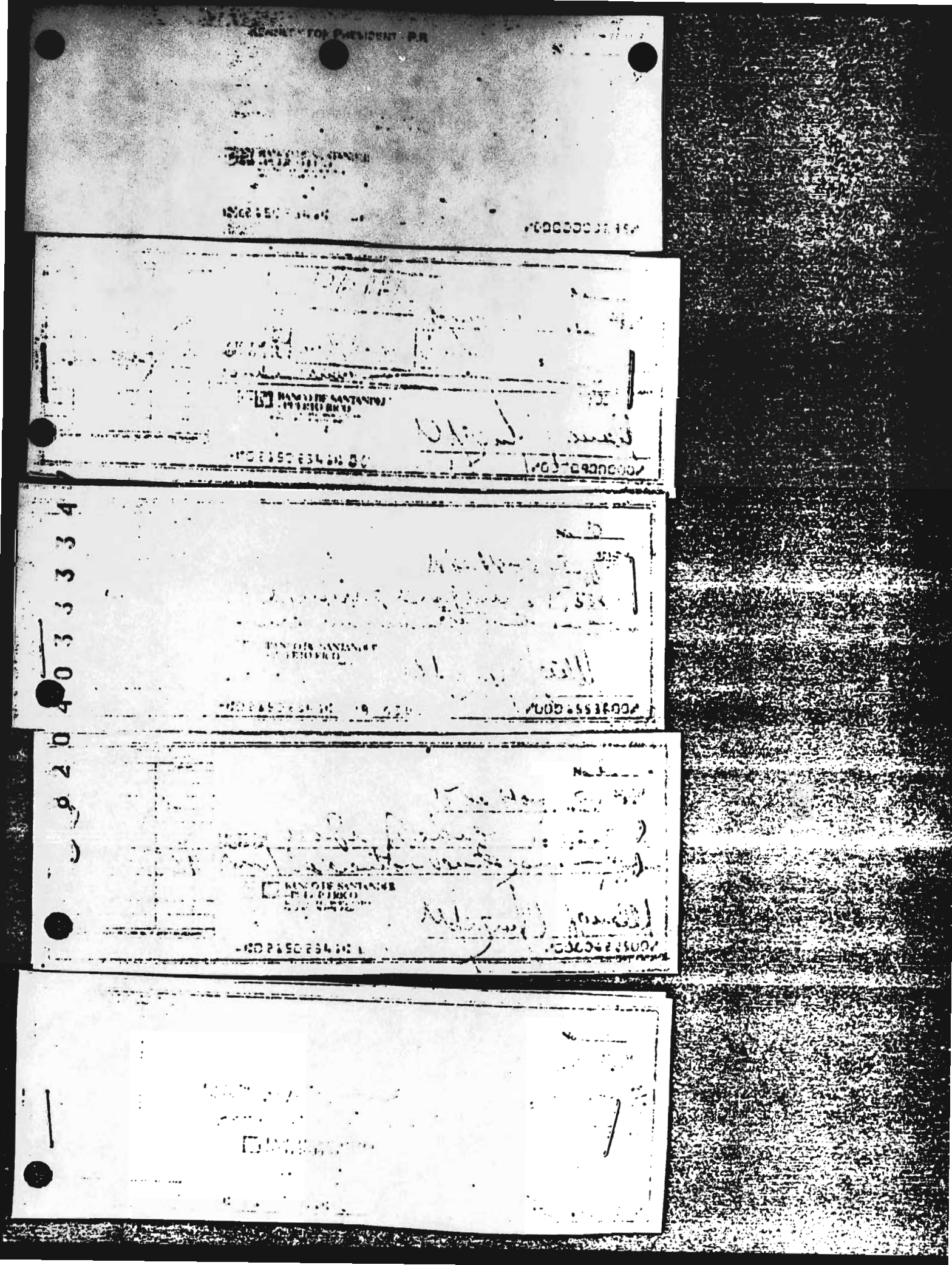
Ciento cincuenta siete 52/100

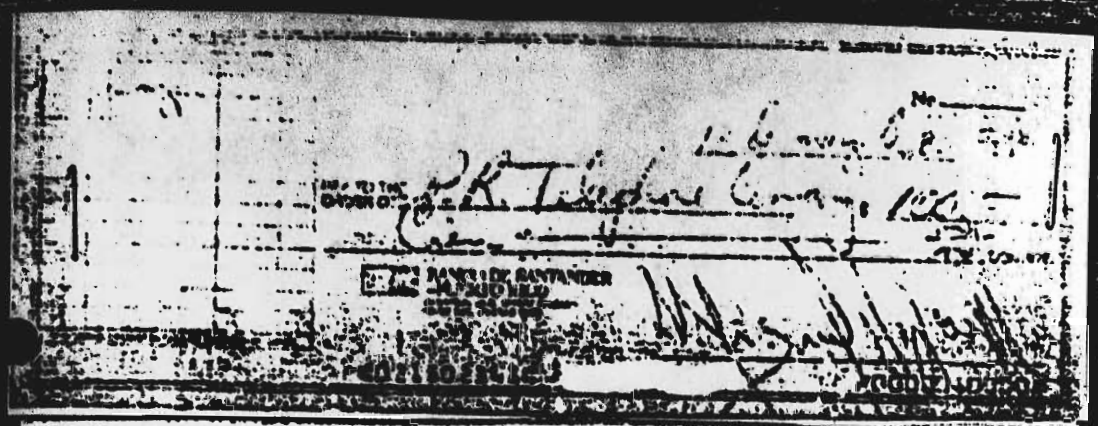
BANCO DE SANTANDER PUERTO RICO

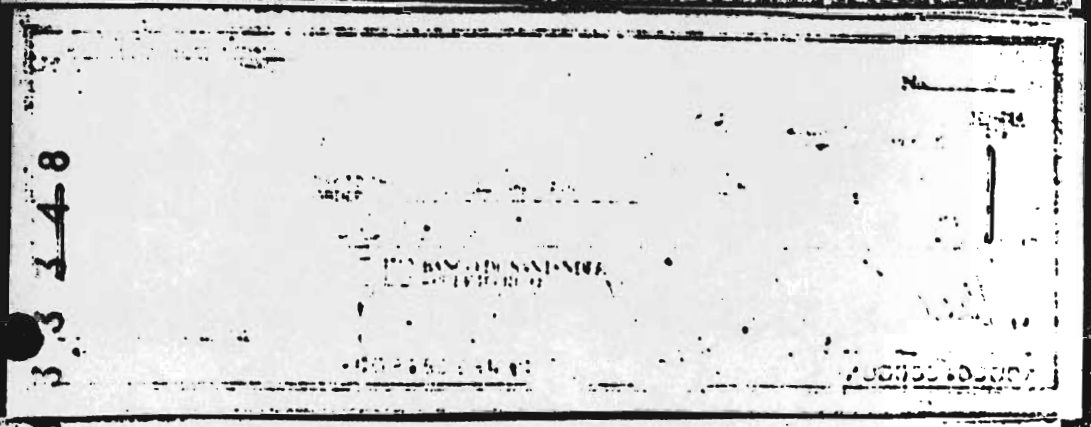
Memo 7SW-0655

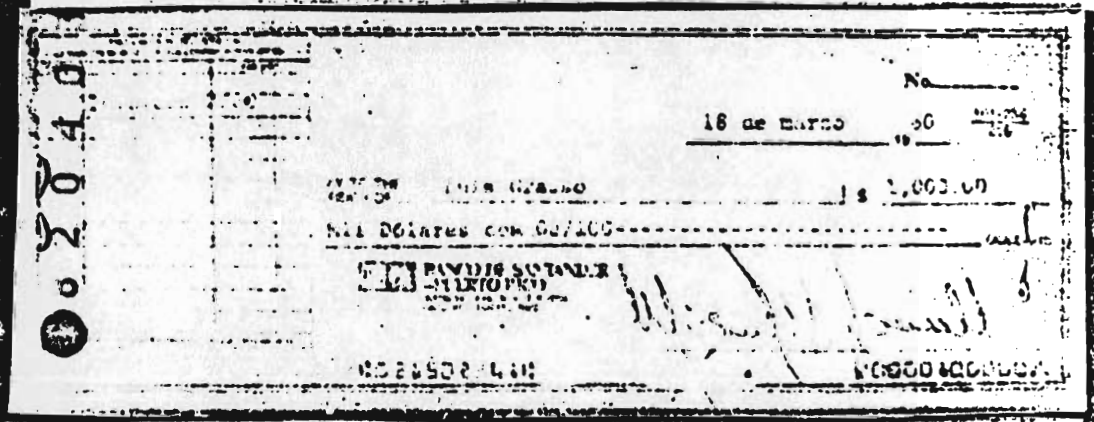
---

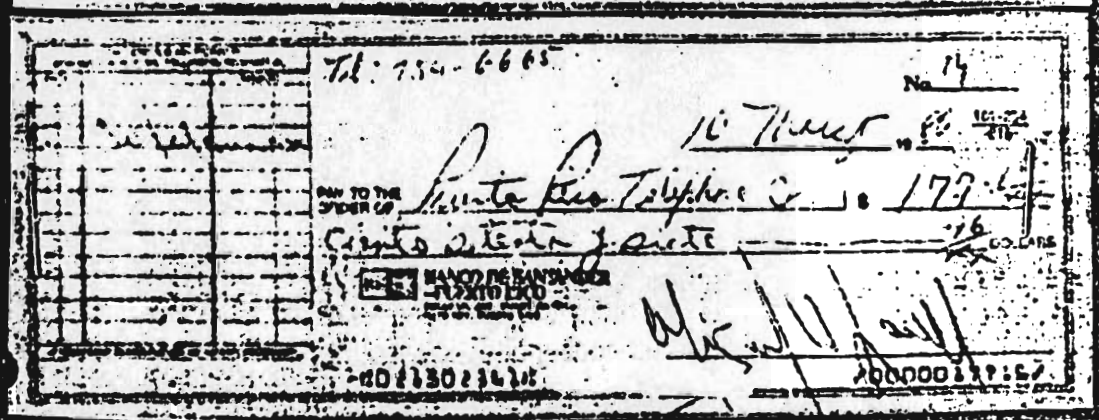
BANCO DE SANTANDER PUERTO RICO

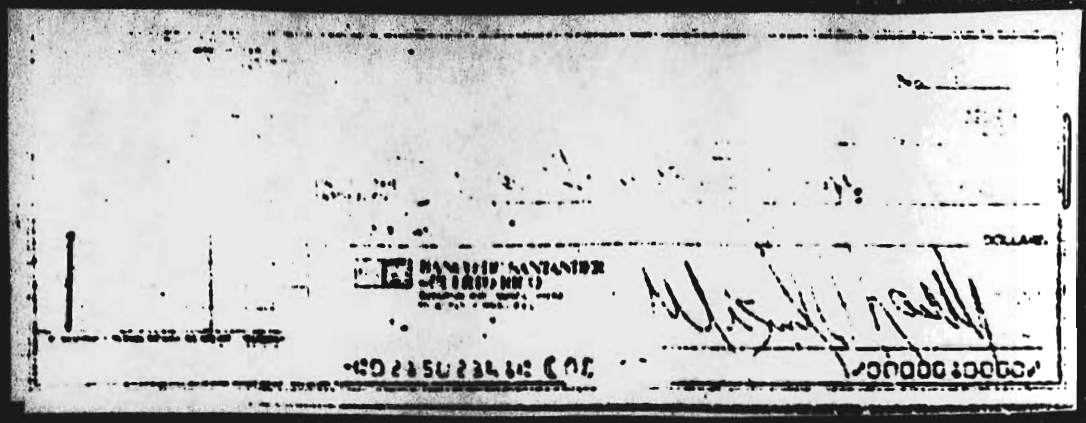


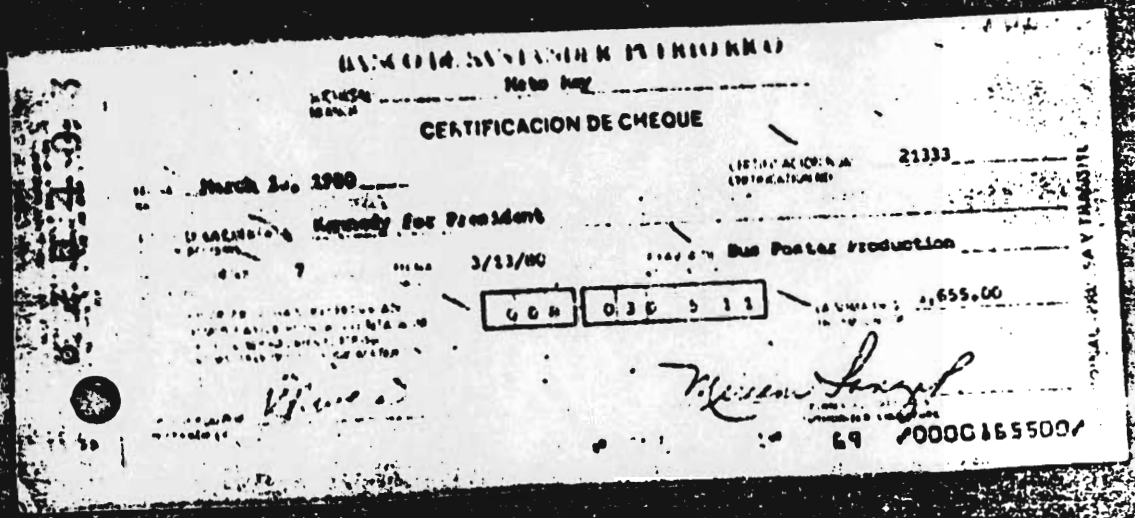











CERTIFICACION DE CHEQUE
March 1st 1980
Kennedy for President
21333
3/11/80
Bus Posters Production
655.00
69

# BANCO DE SANTANDER-PUERTO RICO

BS PR

ACCOUNT NUMBER 215

KENNEDY FOR PRESIDENT P R
ATT. MICHAEL HILL
1250Z ND. STREET
WASHINGTON D.C.

APR 30 80
STATEMENT DATE

PAGE 1

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

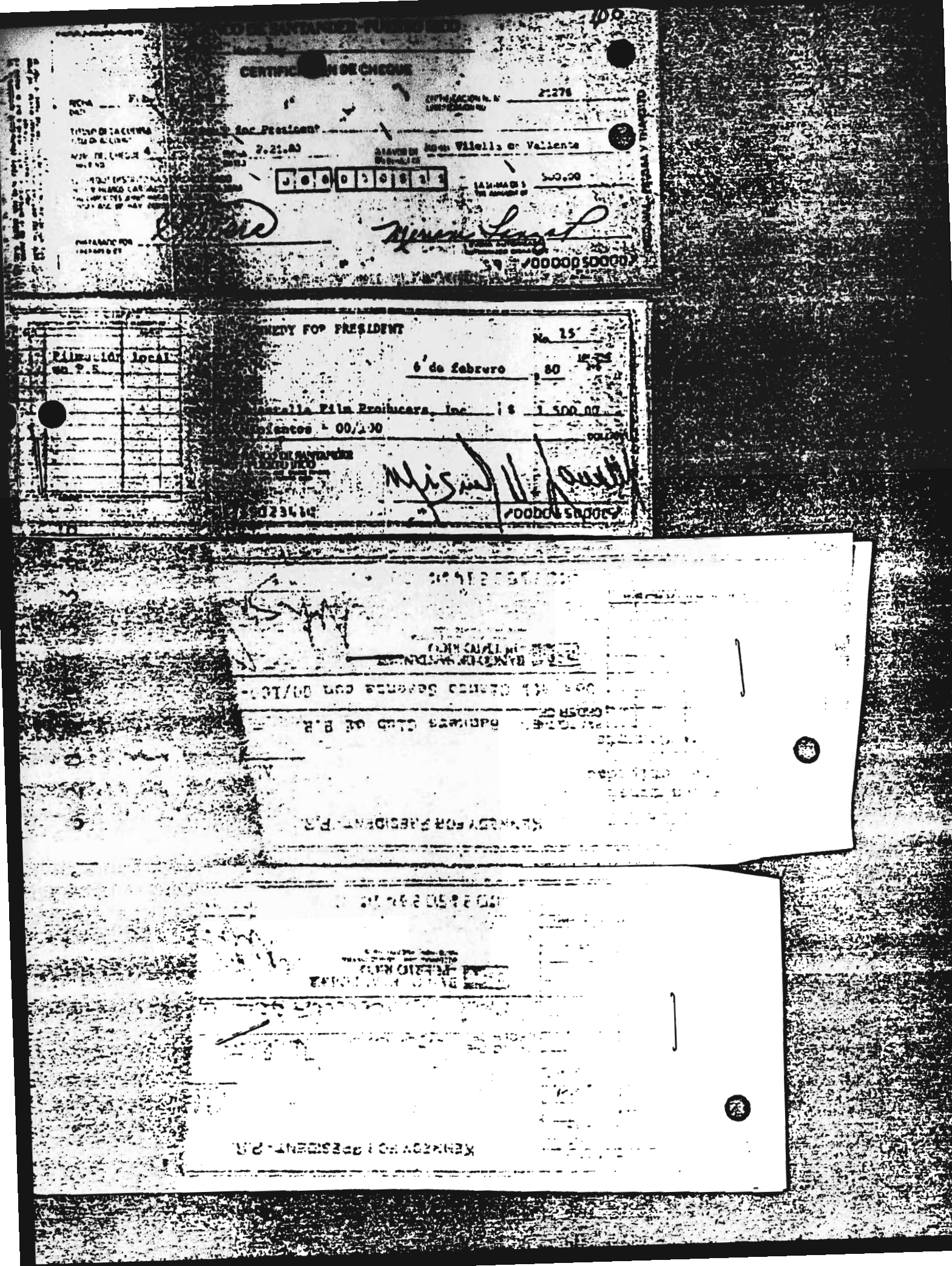
0204033350

| CHECKS AND DEBITS | | CREDITS | DATE | BALANCE |
|---|---|---|---|---|
| | | | MAR31 | 246.26 |
| 150.50 | | | APR07 | 115.76 |
| (940.00) | (850.00) | | APR08 | 1,374.24- |
| 40.00R | 850.00R | | | |
| 0.00S | 6.00S | | APR08 | 103.76 |
| 1,906.38 | 2,160.00 | 6,325.00 | APR11 | 4,362.38 |
| 1,000.00 | | | APR18 | 1,362.38 |
| 800.00 | | | APR21 | 562.38 |
| 334.32 | | | APR22 | 228.06 |
| 95.00 | | | APR25 ✓ | 133.06 |
| 3.00S | | | APR30 | 130.06 |

| NO OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | NUMBER OF ENCLOSURES THIS PAGE |
|---|---|---|---|---|---|---|
| 7 | 6,441.20 | 1 | 6,325.00 | 3.00 | 7 | 7 |

C - CERTIFIED CHECK
D - DEPOSITED ITEM RETURNED
E - ERROR CORRECTION
I - INTEREST ON OVERDRAFT
M - LIST OF CHECKS
R - RETURNED ITEM
S - SERVICE CHARGES

(7)



CERTIFICACION DE CHEQUE

2276

Inc President

2.21.80

Maria Vilella or Valiente

300.00

NEDY FOR PRESIDENT

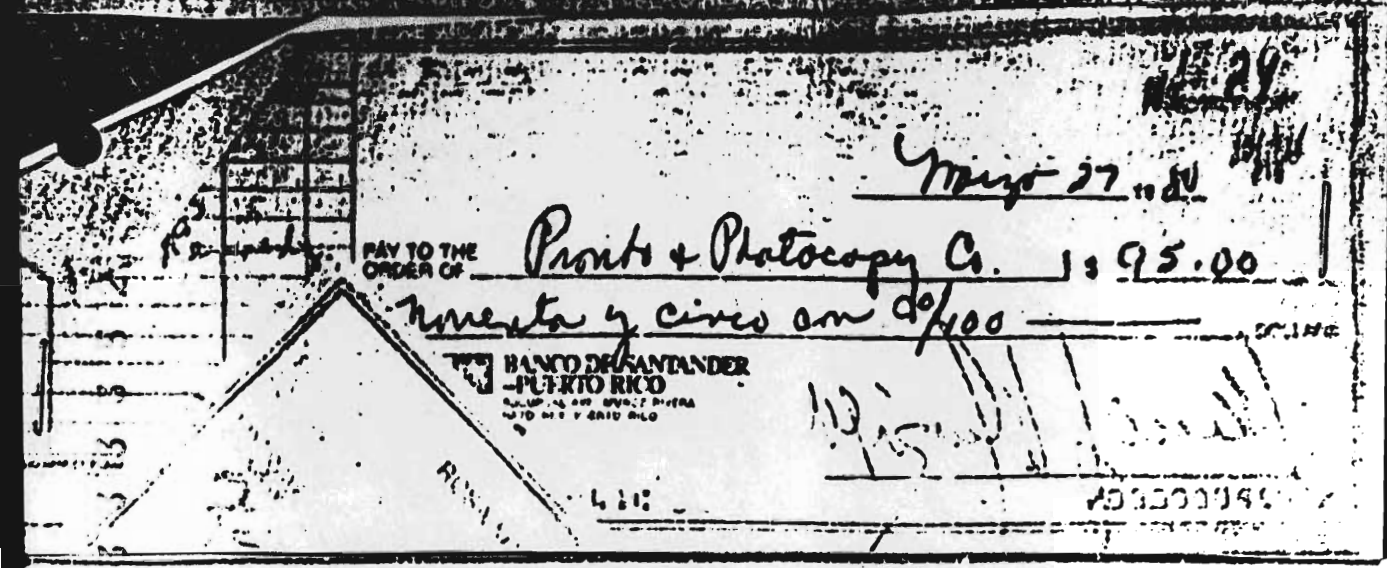
No. 15

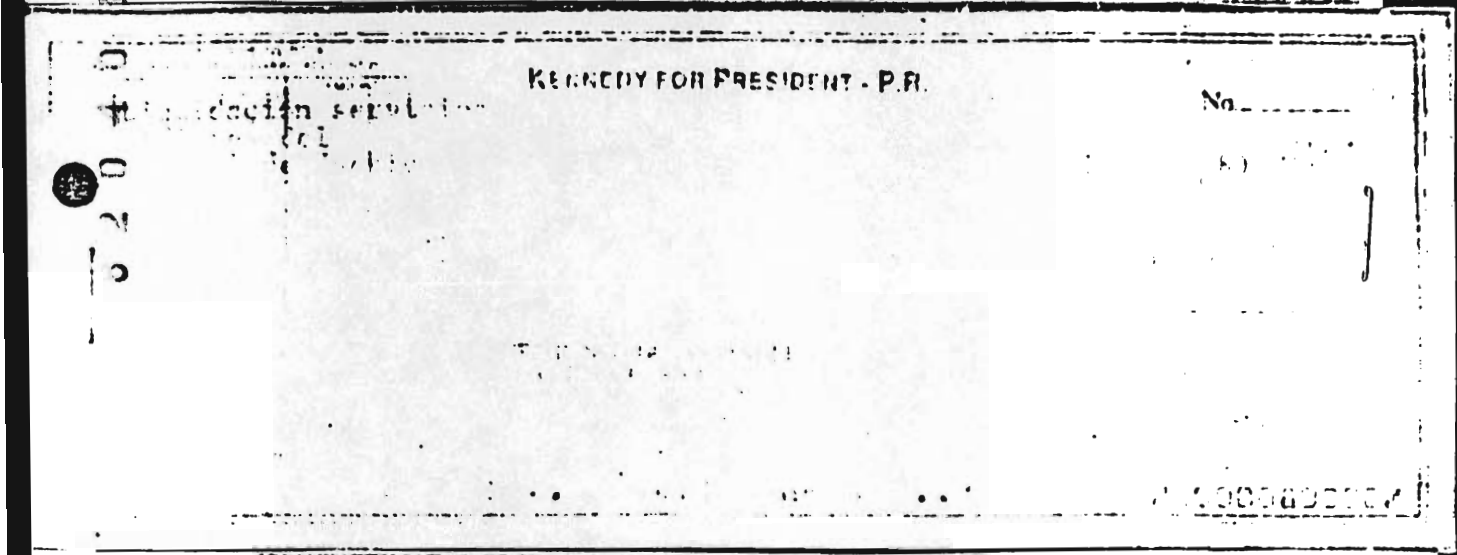
6 de febrero 80

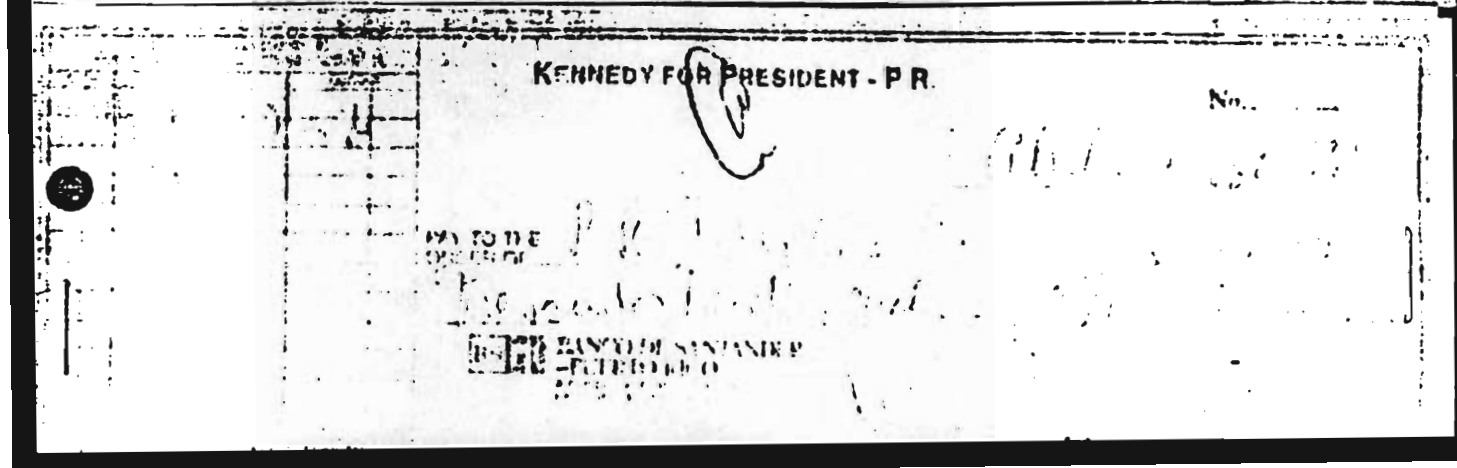
Vilella Film Proiucara, Inc $ 1 500.00

Pesos 00/100

Filmación local


PAY TO THE ORDER OF
Prints + Photocopy Co.
$ 95.00
BANCO DE SANTANDER
-PUERTO RICO


KENNEDY FOR PRESIDENT - P.R.
No.


KENNEDY FOR PRESIDENT - P.R.
No.

KENNEDY FOR PRESIDENT - P.R.

No.

April 14 '60

PAY TO THE ORDER OF

$ 1,000.00

DOLLARS

BANCO DE SANTANDER PUERTO RICO

# BANCO DE SANTANDER-PUERTO RICO

BS PR

ACCOUNT NUMBER

MAY 30 EC
STATEMENT DATE
PAGE 1

KENNEDY FOR PRESIDENT P R 215
ATT. MICHAEL HILL
1250 2 ND. STREET
WASHINGTON D.C.

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | CREDITS | DATE | BALANCE |
|---|---|---|---|
| | | APR 30 | 130.00 |
| 3.00 S | | MAY 3 | 127.00 |

| NO OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | NUMBER OF ENCLOSURES THIS PAGE |
|---|---|---|---|---|---|---|
| | 3.00 | | .00 | 3.00 | | |

KEY TO SYMBOLS
C - CERTIFIED CHECK
D - DEPOSITED ITEM RETURNED
E - ERROR CORRECTION
I - INTEREST ON OVERDRAFT
O - COST OF CHECKS
R - RETURNED ITEM
S - SERVICE CHARGES

FWNN1-00001-R0478

0 2 0 4 0 3 3 3 3 5 4

# BANCO DE SANTANDER-PUERTO RICO

BS PR

CONSERVAR ENERGIA ES AHORRAR
SU BANCO AMIGO DESEA QUE AHORRE - CONSERVE ENERGIA

ACCOUNT NUMBER

KENNEDY FOR PRESIDENT P.R. 215
12502 22ND ST. N.W.
WASHINGTON D.C.

JUN 30 80
STATEMENT DATE

PAGE 1

En el Santander lo que cuenta es la gente . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bien y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | CREDITS | DATE | BALANCE |
|---|---|---|---|
| | | MAY 30 | 127.00 |
| 108.00C | 365.00 | JUN 13 | 384.00 |
| 40.00M | | JUN 25 | 344.00 |

| NO. OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO. OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF OVERDRAFTS THIS PERIOD | NUMBER OF OVERDRAFTS THIS PAGE |
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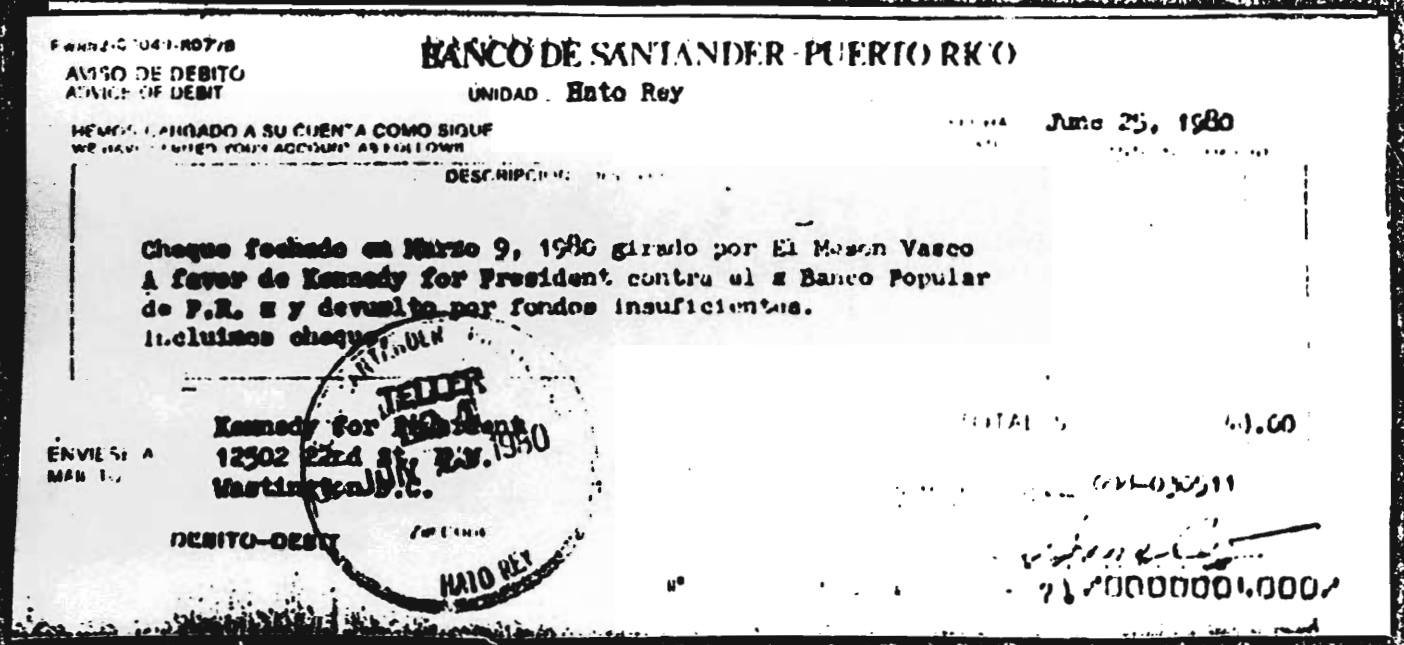
| 2 | 148.00 | 1 | 365.00 | .00 | 2 | 2 |

KEY TO SYMBOLS

C - CERTIFIED CHECK
D - DEPOSITED ITEM RETURNED
E - ERROR CORRECTION
F - FEE FOR CHECKS PAID
I - INTEREST ON OVERDRAFT
L - LIST OF CHECKS
M - MEMO
R - RETURNED ITEM
S - SERVICE CHARGES
V - OVERDRAFT

(7)



BANCO DE SANTANDER-PUERTO RICO

AVISO DE DEBITO
ADVICE OF DEBIT

UNIDAD Hato Rey

June 25, 1980

HEMOS CARGADO A SU CUENTA COMO SIGUE
WE HAVE CHARGED YOUR ACCOUNT AS FOLLOWS

DESCRIPCION:

Cheque fechado en Marzo 9, 1980 girado por El Meson Vasco
A favor de Kennedy for President contra ul s Banco Popular
de P.R. s y devuelto por fondos insuficientes.
Incluimos cheque

TELLER 4
JUN 25 1980
HATO REY

Kennedy for President
12502 22nd St. NW.
Washington D.C.

ENVIESE A
MAIL TO

DEBITO-DEBIT

TOTAL $ 61.00

$ 61.00

# BANCO DE SANTANDER PUERTO RICO

BS PR

CONSERVAR ENERGIA ES AHORRAR
SU BANCO AMIGO DESEA QUE AHORRE - CONSERVE ENERGI.

ACCOUNT NUMBER

KENNEDY FOR PRESIDENT P.R. 215
12502 22ND ST. N.W.
WASHINGTON D.C.

AUG 29 80
STATEMENT DATE

PAGE 1

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | CREDITS | DATE | BALANCE |
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| | | JUL31 | 344.[illegible] |

| NO. OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO. OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | THIS PAGE |
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KEY TO SYMBOLS

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L - LIST OF CHECKS
M - MEMO
R - RETURNED ITEM
S - SERVICE CHARGES
(-) OVERDRAFT

PLEASE VERIFY THIS STATEMENT PROMPTLY. IF NO ADVICE IS RECEIVED WITHIN 10 DAYS IT WILL BE CONSIDERED CORRECT.

# BANCO DE SANTANDER-PUERTO RICO

BS PR

CONSERVAR ENERGIA ES AHORRAR
SU BANCO AMIGO DESEA QUE AHORRE - CONSERVE ENERGIA

ACCOUNT NUMBER : 0204033333358

KENNEDY FOR PRESIDENT P.R. 2
12502 22ND ST. N.W.
WASHINGTON D.C.

JUL 31 80
STATEMENT DATE

PAGE 1

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | | CREDITS | DATE | BALANCE |
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| | | | JUN30 | 344.06 |

| NO OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | NUMBER OF ENCLOSURES THIS PAGE |
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KEY TO SYMBOLS:
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L - LIST OF CHECKS
M - MEMO
R - RETURNED ITEM
S - SERVICE CHARGES
(-) OVERDRAFT

PLEASE VERIFY THIS STATEMENT PROMPTLY. IF NO ADVICE IS RECEIVED WITHIN 10 DAYS IT WILL BE CONSIDERED CORRECT.

# BANCO DE SANTANDER-PUERTO RICO.

BSPR

ACCOUNT NUMBER

SEP 30 80
STATEMENT DATE

PAGE 1

KENNEDY FOR PRESIDENT P.R.
12502 22ND ST. N.W.
WASHINGTUN D.C.

21!

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | CREDITS | DATE | BALANCE |
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PLEASE VERIFY THIS STATEMENT PROMPTLY. IF NO ADVICE IS RECEIVED WITHIN 10 DAYS IT WILL BE CONSIDERED CORRECT.

8204033359

# BANCO DE SANTANDER-PUERTO RICO

BS PR

ACCOUNT NUMBER

OCT 31 80
STATEMENT DATE

PAGE 1

KENNEDY FOR PRESIDENT P.R. 213
12502 22ND ST. N.W.
WASHINGTON D.C.

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | CREDITS | DATE | BALANCE |
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| | | SEP30 | 344.06 |

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(-) OVERDRAFT

PLEASE VERIFY THIS STATEMENT PROMPTLY IF NO ADVICE IS RECEIVED WITHIN 10 DAYS IT WILL BE CONSIDERED CORRECT.

# BANCO DE SANTANDER-PUERTO RICO

BS PR

FWNN1-00001-AD478

ACCOUNT NUMBER

NOV 28 00
STATEMENT DATE

PAGE 1

KENNEDY FOR PRESIDENT P.R. 215
12502 22ND ST. N.W.
WASHINGTON D.C.

En el Santander lo que cuenta es la gente. . .ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras sucursales. Le atenderán bién y le apreciarán como cliente y amigo.

FDIC

| CHECKS AND DEBITS | | CREDITS | DATE | BALANCE |
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| 0204033361 | | | OCT31 | 344.06 |

| NO OF CHECKS AND DEBITS | TOTAL CHECKS AND DEBITS | NO OF CREDITS | TOTAL CREDITS | SERVICE CHARGE | NUMBER OF ENCLOSURES THIS PERIOD | THIS PAGE |
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M - MEMO
R - RETURNED ITEM
S - SERVICE CHARGES
(-) OVERDRAFT

PLEASE VERIFY THIS STATEMENT PROMPTLY. IF NO ADVICE IS RECEIVED WITHIN 10 DAYS [illegible]

# BANCO DE SANTANDER-PUERTO RICO

BS PR SU BANCO AMIGO LES DESEA FELICES PASCUAS Y ALEGRIA EN LA NAVIDAD.

ACCOUNT NUMBER 0204033336

KENNEDY FOR PRESIDENT P.R. 715
12502 22ND ST. N.W.
WASHINGTON D.C.

DEC 31 80
STATEMENT DATE

PAGE 1

Si el Santander le queda cerca, ¡ABRA UNA CUENTA DE AHORRO! Acérquese de nuestras oficinas, La Sucursal Más Cerca y la apreciaremos como cliente y amigo.

| CHECKS AND DEBITS | | CREDITS | DATE | BALANCE |
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| | | | NOV28 | 344.06 |
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| | | | |

# BANCO DE SANTANDER-PUERTO RICO

BS PR

SU BANCO AMIGO, LES DESEA FELICES PASCUAS Y ALEGRIA EN LA NAVIDAD.

ACCOUNT NUMBER

KENNEDY FOR PRESIDENT P.R.
1202 22ND ST N.W.
WASHINGTON D.C.

JAN 30 81
STATEMENT DATE

PAGE 1

En el Banco de Santander le damos la bienvenida a nuestra cliente y amiga.

| CHECKS AND DEBITS | | CREDITS | DATE | BALANCE |
|---|---|---|---|---|
| | | | DEC31 | 344.06 |
| | .00 | .00 | | .00 |

C - CERTIFIED CHECK
D - DEPOSITED ITEM RETURNED
E - ERROR CORRECTION
F - FEE FOR CHECKS PAID
I - INTEREST ON SAVINGS
L - LIST OF CHARGES
M - MEMO

PLEASE EXAMINE THIS STATEMENT PROMPTLY. IF NO ADVICE IS RECEIVED WITHIN 10 DAYS IT WILL BE CONSIDERED CORRECT

# BANCO DE SANTANDER - PUERTO RICO

BS PR

ACCOUNT NUMBER

FEB 27 81
STATEMENT DATE
PAGE 1

KENNEDY FOR PRESIDENT P.R.
12502 22ND ST. N.W.
WASHINGTON D.C.

219

En el Santander lo que cuenta es la gente ABRA UNA CUENTA DE AHORRO en cualquiera de nuestras oficinas. Le atenderán bien y lo verán como cliente y amigo

FDIC

6204033

| CHECKS AND DEBITS | DATE | BALANCE |
|---|---|---|
| | JAN 30 | 346.08 |

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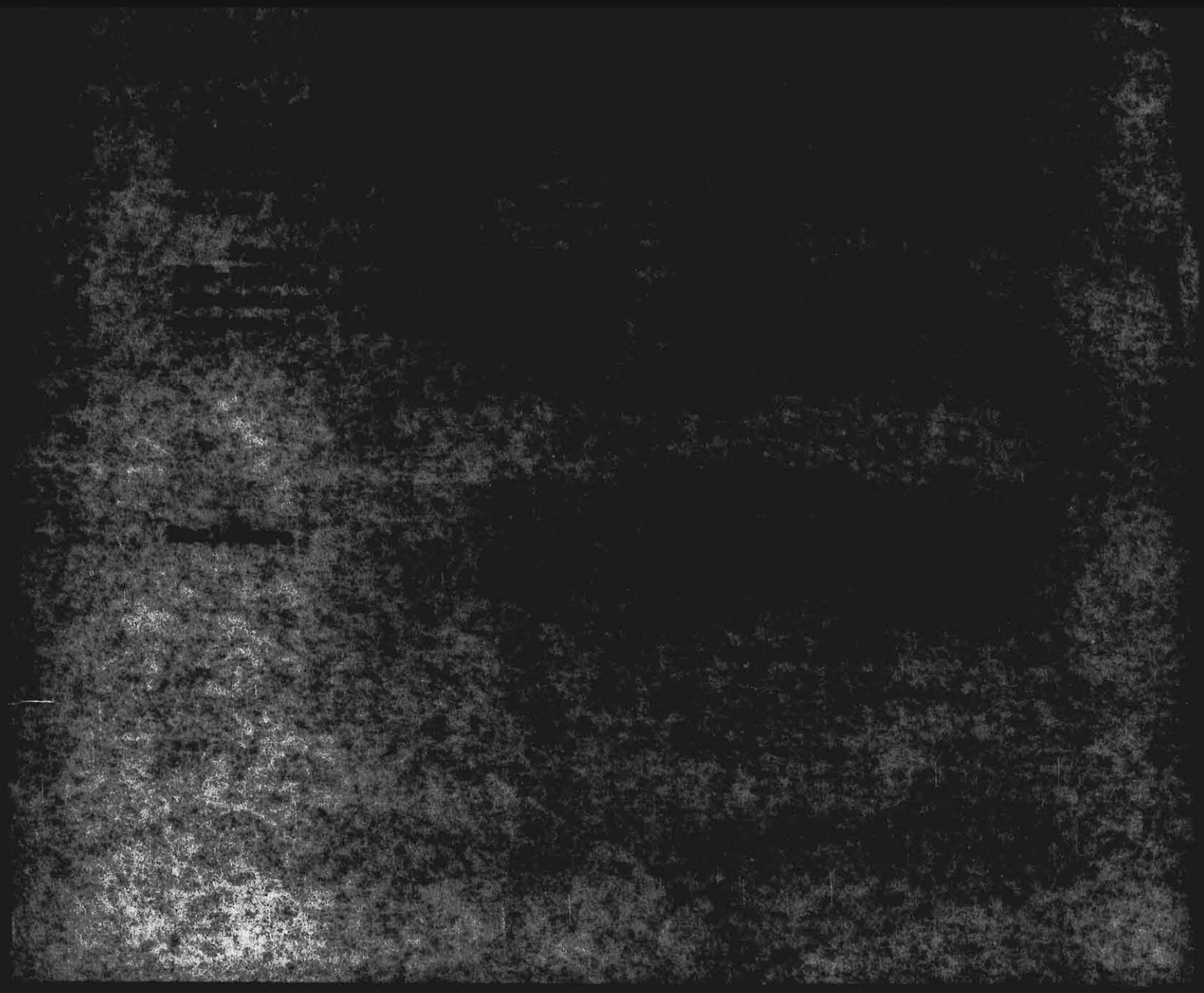
| | .00 | | .00 | .00 |

C - CERTIFIED CHECK
D - DEPOSIT ITEM RETURNED
E - ERROR CORRECTION
S - SAFE DEPOSIT CHARGES

Banco Santander Puerto Rico
GPO Box 2589
San Juan, Puerto Rico 00936

81 APR 20 AM 9:08

Ms. Marsha Gentner
Office of General Counsel
Federal Election Commission
1325 K Street
N. W. Washington, D C 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ruben Rivera Collado
Banco de Santander-Puerto Rico
San Juan Branch
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

Re: MUR 1370

Dear Mr. Collado:

Enclosed please find the executed Certification of Compliance with the Right to Financial Privacy Act issued with respect to the subpoena duces tecum to the bank in the above-referenced matter. The subpoena was received by you on March 16, 1981. Accordingly, the documents requested in the subpoena should be sent by the bank, by certified mail to the address specified in the subpoena, as soon as possible but in no event later than fifteen days after your receipt of this letter. An invoice detailing the reasonable costs incurred by the bank in complying with the subpoena should also be forwarded at that time, so that the Commission can reimburse the bank for those expenses.

Again, if you have any questions or problems concerning compliance with the Commission subpoena, please call Marsha Gentner, the attorney handling this matter, at (202)523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

cc William C. Oldaker, Treas.
Kennedy for President Committee

8204033367

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

# CERTIFICATION OF COMPLIANCE WITH THE RIGHT TO FINANCIAL PRIVACY ACT

TO: Banco de Santander - Puerto Rico
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

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

RE: MUR 1370

I hereby certify, pursuant to Section 1103(b) of the Right to Financial Privacy Act of 1978, 12 U.S.C. § 3403(b), that the provisions of the Act have been complied with as to the enclosed Subpoena Duces Tecum To Produce Certain Documents and Materials which is being issued pursuant to 2 U.S.C. § 437d(a)(3). I further certify that good faith reliance upon this certificate relieves your institution and its employees and agents of any possible liability to the customer in connection with the disclosure of this information.

24 March 1981
Date

Charles N. Steele
General Counsel

0204033368

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 24, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ruben Rivera Collado
Banco de Santander-Puerto Rico
San Juan Branch
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

Re: MUR 1370

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Sincerely,

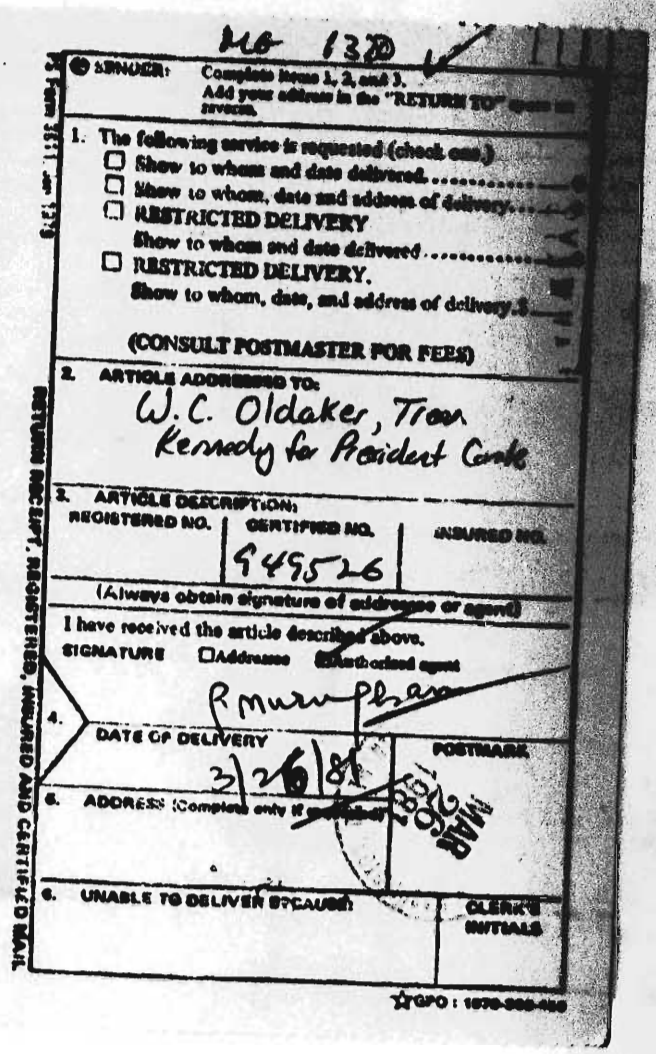
Charles N. Steele
General Counsel

Enclosure

cc William C. Oldaker, Treas.
Kennedy for President Committee

6204033369

820403333370



MG 132D

PS Form 3811, Jan. 1979

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
W.C. Oldaker, Treas.
Kennedy for President Comte

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 949526 | |

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY 3/26/81 POSTMARK MAR 1981

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO : 1979-300-439

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

# CERTIFICATION OF COMPLIANCE WITH THE RIGHT TO FINANCIAL PRIVACY ACT

TO: Banco de Santander - Puerto Rico
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

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

RE: MUR 1370

I hereby certify, pursuant to Section 1103(b) of the Right to Financial Privacy Act of 1978, 12 U.S.C. § 3403(b), that the provisions of the Act have been complied with as to the enclosed Subpoena Duces Tecum To Produce Certain Documents and Materials which is being issued pursuant to 2 U.S.C. § 437d(a)(3). I further certify that good faith reliance upon this certificate relieves your institution and its employees and agents of any possible liability to the customer in connection with the disclosure of this information.

24 March 1981
Date

Charles N. Steele
General Counsel

0204033371

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 12, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Ruben Rivera Collado
Banco de Santander-Puerto Rico,
San Juan Branch
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

RE: MUR 1370

Dear Mr. Collado:

Enclosed is a subpoena for the production of certain documents issued by the Federal Election Commission in connection with its investigation of MUR

The documents requested must be sent by certified mail to the address specified in the subpoena within fifteen days of your receipt of the Commission's certification that the provisions of the Financial Privacy Act of 1978 have been complied with by the agency. As required by section 1115 of the Financial Privacy Act of 1978, the Commission will reimburse the bank for the reasonable costs incurred a complying with this subpoena

Please be advised that 2 U.S.C. § 437g(a)(12) prohibits any person from making public the fact of "any notification or investigation" by the Commission unless the respondent instructs the Commission, in writing, to make the investigation public. No such written permission has been received in this matter.

If you have any questions, please contact Ms. Marsha Gentner, the attorney assigned to this matter, at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

8204033372

MB 1350 Reuters

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Ruben Rivera Collado.

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 948320 | |

(Always obtain signature of addressee or agent)

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

José Luis Cintrón

4. DATE OF DELIVERY 3-11-81 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS

MAR 1981 P.R.

7-12-81

P.S. Form 3811, Jan. 1974 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO: 1978-255-865

820403333373

[redacted]

[redacted]

[redacted]

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 12, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Oldaker
Kennedy for President Committee
1050 17th Street, N.W.
Washington, D.C. 20036

RE: MUR 1370

Dear Mr. Oldaker:

On February 23, 1981, the Federal Election Commission determined that there is reason to believe that the Kennedy for President Committee ("the Committee") violated §§ 432(h)(1), 433(b)(6) and (c), 434(b)(2)(A), (b)(3)(A), (b)(4)(A), and (b)(5)(A) of the Federal Election Campaign Act of 1971, as amended ("the Act") in connection with the Committee's Puerto Rico activity. The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

We have numbered this matter MUR 1370. Please refer to this number in all future correspondence.

Under the Act, you have an opportunity to demonstrate that no action should be taken against the Committee. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Your response should be submitted within ten days of your receipt of this letter. Where appropriate, statements should be submitted under oath.

In the absence of any additional information which demonstrates that no further action should be taken against the 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 the Committee so desires.

0204033375

The investigation now being conducted will be 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 the Committee wishes the investigation to be made public. If you have any questions, please contact Marsha Gentner, the attorney assigned to this matter, at (202) 523-5071.

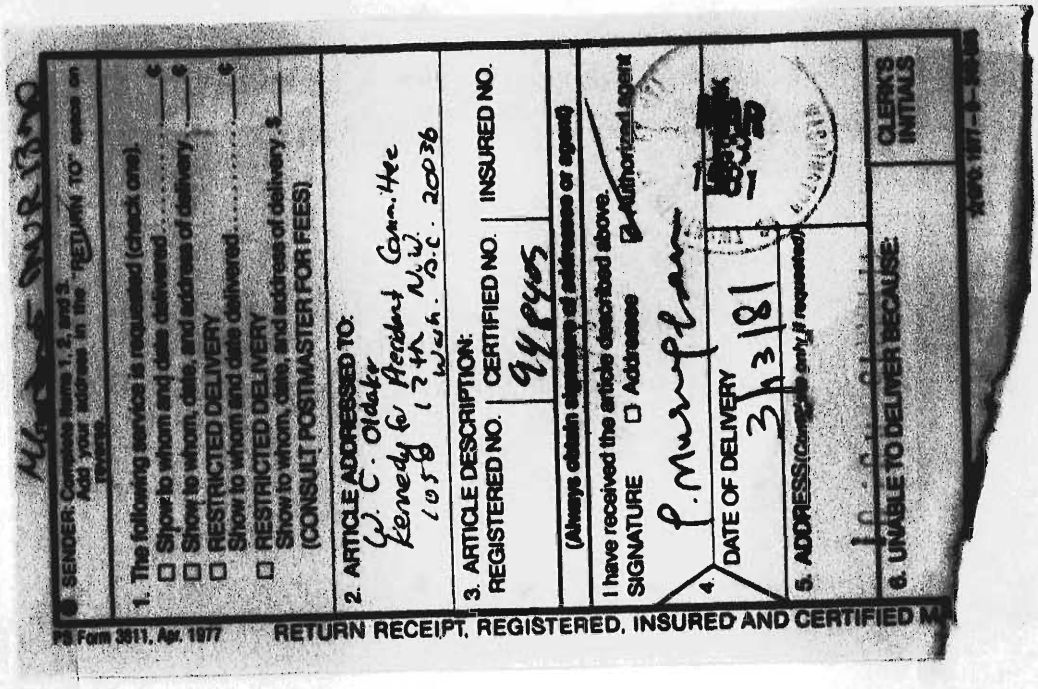
Sincerely,

Frank P. Reiche

Frank P. Reiche
Vice Chairman

Enclosure

General Counsel's Factual and Legal Analysis




8204033376

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

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE: February 18, 1981

MUR NO: 1370
STAFF MEMBER(S) & TEL. NO.
Marsha Gentner
(202) 523-5071

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

2040333379

SUMMARY OF ALLEGATIONS

This matter stems from a letter from the Kennedy for President Committee, acknowledging that its Puerto Rico authorized committee violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), by failing to timely report certain contributions received and expenditures made, as well as the addition of a Committee depository in Puerto Rico.

FACTUAL AND LEGAL ANALYSIS

BACKGROUND

On December 3, 1980, the Commission received a letter from William C. Oldaker, counsel for the Kennedy for President Committee ("KFP" or "the Committee") concerning certain violations of the Act by the KFP Puerto Rico authorized affiliate that came to the attention of the Committee. Specifically, the letter noted that a Puerto Rican depository of KFP had not been timely registered with the Commission as required by the Act, that five deposits made into this Puerto Rican depository were not reported by the Committee in FEC disclosure reports, that two Committee expenditures in Puerto Rico were made by means other than a check from a registered depository, and that these latter two expenditures were not timely reported by the Committee. In addition, the letter acknowledges that KFP funds were raised in Puerto Rico by means of a radio "marathon", but that these funds received were not placed in a KFP registered depository as required by the Act, and that the contributions comprising them were not timely reported.

In keeping with the usual Commission practice, this matter was designated as a Pre-MUR, on December 4, 1980.

0204033380

FACTUAL AND LEGAL ANALYSIS

A. KFP Puerto Rican Bank Account

Mr. Oldaker's letter on behalf of KFP indicates that a Committee bank account was opened on January 18, 1980 at the Banco de Santander (_____, G.T.O. Box 2589, San Juan, Puerto Rico, but was not timely registered with the Commission as a Committee depository. 2 U.S.C. § 433(b)(6) requires a political committee to file a statement of organization with the Commission listing all depositories of the Committee. 2 U.S.C. § 433(c) further provides that any change in the information already submitted in a statement of organization shall be reported within ten days after the date of the change. See also 11 C.F.R. §§ 102.2(a)(1)(vi) and (2) and 103.1. No such amended statement of organization designating Banco de Santander as a Committee depository was filed from January 18, 1980 (the date the KFP account was opened at that depository) to January 28, 1980. 1/ Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 433(b)(6) and (c) and 11 C.F.R. §§ 102.2(a)(1)(vi) and (2) and 103.1 by failing to timely report the Committee Puerto Rican depository to the Commission.

Mr. Oldaker's letter also acknowledges that five deposits of Committee raised funds, in the amounts and on the dates listed below, were made into the KFP Banco de Santander depository, but were not reported to the Commission. These deposits were:

| DATE | AMOUNT |
|---|---|
| February, 1980 | $4,000.00 |
| February, 1980 | $2,000.00 |
| March, 1980 | 20.00 |
| April 11, 1980 | $6,325.00 |
| June 13, 1980 | 365.00 |

---

1/ The Committee did file an amended Statement of Organization on February 26, 1980, listing as a depository "Banco De Santauder, Sucurbal Ave., Morez Rivera, Hato Rey, Puerto Rico. This may be the same depository as that referred to above, although the address is not the same as that listed in the Oldaker letter, or as that listed for the Banco de Santander in Hato Rey. However, even if this is the same depository as the one in question, the statement of organization listing this depository was filed on February 26, 1980, well after the 10 day period set forth in 2 U.S.C. § 433(c).

2 U.S.C. § 434(b)(2)(A) requires each political committee to file periodic reports disclosing the total amount of committee receipts in contributions from persons, for the reporting period and for the calendar year. See also 11 C.F.R. § 104.3(a)(3)(i). As the letter from Mr. Oldaker on behalf of KFP admits that the contributions comprising the five deposits listed above were not disclosed in Committee reports filed with the Commission, the Office of General Counsel recommends that the Commission find there is reason to believe that KFP violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i). 2/

In addition, documents submitted on behalf of the Committee (attached to Mr. Oldaker's letter) show that some of the contributions comprising the April 11, 1980 deposit into the account at Banco de Santander were in excess of $200. As the letter submitted on behalf of the Committee acknowledges that these contributions were not reported by KFP to the Commission, the Office of General Counsel recommends that the Commission find there is reason to believe the Committee also violated 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4) (i) by failing to designate in reports filed with the Commission, the identity (full name, mailing address, occupation, and name of employer, 11 C.F.R. § 100.12) of each person that made a contribution in excess of $200 to the Committee.

B. KFP Puerto Rico Fundraising Event

Some time before the March 16, 1980, Puerto Rican Democratic primary, KFP/Puerto Rico held a radio "marathon". This Committee fundrasing event is described as a day long radio program featuring political and entertainment celebrities in an effort to obtain pledges and contributions for the campaign. During, as well as prior to the radio marathon, contributions were received by KFP/Puerto Rico at various predetermined locations, including Puerto Rican street corners. According to the letter submitted on behalf of the Committee, this marathon raised $99,233.33.

2 U.S.C. § 432(h)(1) provides that all receipts of a political committee must be deposited into an account at a designated campaign depository. See also, 11 C.F.R. § 103.3(a) (such deposit must be made within ten days of the committee's receipt of the funds). As acknowledged by the Committee, KFP/Puerto Rico did not deposit the $99,233.33 received from the radio marathon into a Committee account at a designated depository. Accordingly, the Office of General Counsel recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a).

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2/ Banco Popular de Puerto Rico was not designated as a KFP campaign depository on reports filed by the Committee with the Commission.

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The letter from Mr. Oldaker on behalf of the Committee also acknowledges that the contributions comprising the $99,233.33 received from the radio marathon were not timely reported by the Committee. As previously noted, this information is required to be reported by the provisions in 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i). Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe KFP also violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(i) by failing to timely report the total amount of Committe receipts in contributions from persons for the reporting period during which the KFP/Puerto Rico radio marathon was held.

Finally, the letter submitted on behalf of KFP states that the money received from the radio marathon was paid to two vendors of the Committee. KFP/Puerto Rico made a payment of $88,230.33, in cash, to the advertising firm of Ileana, Lopita and Howie of Puerto Rico. This payment was apparently made to cover the cost of Committee radio and television commericals. In addition, a total payment of $11,000, in the form of bank checks issued by Banco Popular de Puerto Rico 2/, was made by KFP/Puerto Rico on March 19, 1980, to David Sawyer of David Sawyer, Inc., apparently for production costs in connection with Committee commercials. (Copies of these bank checks were included as exhibits to Mr. Oldaker's letter.)

The Committee has acknoweledged that it did not timely report these two expenditures to Ileana, Lopita and Howie and David Sawyer, Inc., respectively, as is required by the Act and the regulations. Thus, the Office of General Counsel recommends that the Commission find there is reason to believe that KFP violated 2 U.S.C. § 434(b)(4)(A) and 11 C.F.R. § 104.3(b)(2)(i) for failing to report Committee disbursements made during the March 1980, reporting period. In that these two Committee expenditures were both in excess of $200, the Office of General Counsel also recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) for failing to timely report the name and address of the persons to whom these expenditures were made, as well as the date, amount, and purpose of each of the two expenditures. Furthermore, as 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) require all political committee disbursements 3/ to be made by

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2/ Banco Popular de Puerto Rico was not designated as a KFP campaign depository on reports filed by the Committee with the Commission.

3/ Exempted from the provisions of 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) are petty cash expenditures of less than $100. See 2 U.S.C. § 432(h)(2).

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check drawn on an account in a registered campaign depository, and as KFP did not make the two expenditures in question by such method, the Office of General recommends that the Commission find there is reason to believe KFP violated these statutory and regulatory provisions, as well.

RECOMMENDATIONS

1. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 433(b)(6) and (c), and 11 C.F.R. §§ 102.2(a)(1)(vi) and (2), and 103.1 by failing to timely report the Committee's Puerto Rican depository, Banco de Santander.

2. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i) by failing to report the contributions received by the Committee which comprised five deposits made in February, March, April and June, 1980, into the account at Banco de Santander, and by failing to timely report contributions received from the Committee Puerto Rico radio marathon.

3. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3 (a)(4)(i) by failing to designate in reports filed with the Commission, the identity of those persons whose contributions of $200 or more, each, comprised a portion of the five unreported deposits into the Committee account at Banco de Santander in February through June of 1980.

4. Find reason to believe Kennedy for President Committee violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a) by failing to deposit receipts obtained from its radio marathon into an account at a registered campaign depository within ten days of such receipt.

5. Find reason to believe the Kennedy for President Committee violated 2 U.S.C. § 434(b)(4)(A) and 11 C.F.R. § 104.3 (b)(2)(i) by failing to timely report its expenditures of $88,230.33 to Ileana, Lopita and Howie, and $11,000 to David Sawyer, Inc.; and reason to believe that the Committee violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) by failing to timely report the name and address of the persons to whom these expenditures were made, as well as the date, amount, and purpose of each such expenditure.

6. Find reason to believe the Kennedy for President Committee violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) by failing to make its expenditures of $88,230.33 and $11,000 to Ileana, Lopita and Howie, and David Sawyer, Inc., respectively, by check drawn on an account at a registered Committee depository.

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UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

# RIGHT TO FINANCIAL PRIVACY ACT NOTICE

TO: William C. Oldaker, Treasurer
Kennedy for President Committee

Records or information concerning Kennedy for President Committee ("the Committee") transactions held by the financial institution named in the attached subpoena are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

> Investigation of alleged violations of 2 U.S.C. §§ 432(h)(1), 433(b)(6) and (c), 434(b)(2)(A), (b)(3)(A), and (b)(4)(A) by the Committee in connection with the failure to timely report certain Committee expenditures and receipts, and the failure to deposit receipts into and make expenditures from a registered Committee depository. See General Counsel's Legal and Factual Analysis (February 18, 1981) in MUR 1370.

If the Committee desires, that such records or information not be made available, you must:

1. Fill out the accompanying motion paper and sworn statement or write one of your own stating that the Committee is the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice and/or any other legal basis for objecting to the release of the records.

2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts: United States District Court for the District of Columbia, United States District Court for the District of Puerto Rico.

3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to Charles N. Steele, General Counsel, 1325 K Street, N.W., Washington, D.C. 20463.

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4. Be prepared to come to court and present the Committee's position in further detail.

5. The Committee does not need to have a lawyer, although you may wish to employ one to represent the Committee and protect its rights.

If the above procedures are not followed by someone acting on behalf of the Committee upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event the Committee will be notified after the transfer.

12 March 1981
Date

Charles N. Steele
General Counsel
Federal Election Commission

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3. Copies of the front and back of all cancelled checks, drawn on account number 008-0351 from the period of January 18, 1980 to present.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set his hand at the Office of the Commission, 1325 K Street, N.W., Washington, D.C. 20463, this 25th day of February, 1981.

JOHN WARREN McGARRY
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

0204033386

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 10, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. José R. Mulero
Assistant VP Manager
Banco de Santander - Puerto Rico
G.P.O. Box 2589
San Juan, Puerto Rico 00936

Dear Mr. Mulero:

Enclosed please find a copy of a letter and enclosure sent by this office to your bank, care of Mr. Ruben Rivera, on March 24, 1981. I apologize for the confusion; however, the letter was sent before your letter notifying this office of the appropriate bank officer in charge was received.

Please notify Marsha Gentner of my office, at (202) 523-5071 if you incur any problems which will delay timely production of the subpoenaed materials. Thank you for your cooperation and prompt attention to this matter.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Kenneth A. Gross
Associate General Counsel

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MUR 1370 Gentner

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

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

(CONSULT POSTMASTER FOR FEES)

2. ARTICLE ADDRESSED TO:
Jose R. Mulero
G.P.O. Box 2589
San Juan, Puerto Rico 00936

3. ARTICLE DESCRIPTION:
REGISTERED NO. | CERTIFIED NO. | INSURED NO.
E819546

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY
04/15/81

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

POSTMARK 1981 APR 15

PS Form 3811, Jan. 1979 RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

☆GPO: 1979-325-865

4-10-81

0 2 0 4 0 3 3 3 3 8 8

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IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

KENNEDY FOR PRESIDENT COMMITTEE )
)
Petitioner, )
)
)
v. )
)
)
FEDERAL ELECTION COMMISSION )
)
Respondent )

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

, on behalf of petitioner Kennedy for President Committee, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by respondent Federal Election Commission and, in support thereof, deposes and says as follows:

1. Kennedy for President Committee (hereinafter "the Committee") is a customer of the Banco de Santander Puerto Rico from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to the Committee's transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, petitioner moves the court to enter an order quashing the attached subpoena.

[Treasurer/Chairman/Counsel for]
Kennedy for President Committee

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 12, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Oldaker, Esquire
Treasurer, Kennedy for President
Committee
1050 17th Street, N.W.
Washington, D.C. 20036

RE: Matter Under Review (MUR) 1370

Dear Mr. Oldaker:

Enclosed is a subpoena to produce certain documents and materials and order to answer written questions issued by the Federal Election Commission ("Commission") to the Kennedy for President Committee.

The subpoena requires that production of specified documents be made at the time and place stated therein and that responses to the interrogatories be propounded to the Commission within ten (10) days of your receipt of the enclosed order.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosures: Subpoena

cc: Kennedy for President Committee
P.O. Box 3743
Washington, D.C. 20007

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1370 ✓ [illegible]

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

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

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

2. ARTICLE ADDRESSED TO:
J.C. Oldaker
1050 17th N.W.
Wash. D.C. 20036

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO |
|---|---|---|
| | 944396 | |

(Always obtain signature of addressee or agent)

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

P Mumphan 3/13/81

4. DATE OF DELIVERY — POSTMARK
MAR 13 1981

5. ADDRESS (Complete only if requested)

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

☆GPO: 1977 – 0 – 249-595

3-12-81

MG 1370 3-12-81

PS Form 3811, Apr. 1979 — RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

● SENDER: [illegible]
Add your address in the "RETURN TO" space on reverse.

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

2. ARTICLE ADDRESSED TO:
Kennedy for President Committee
P.O. Box 3743
Wash. D.C. 20007

3. ARTICLE DESCRIPTION:

| REGISTERED NO. | CERTIFIED NO. | INSURED NO. |
|---|---|---|
| | 944403 | |

(Always obtain signature of addressee or agent)

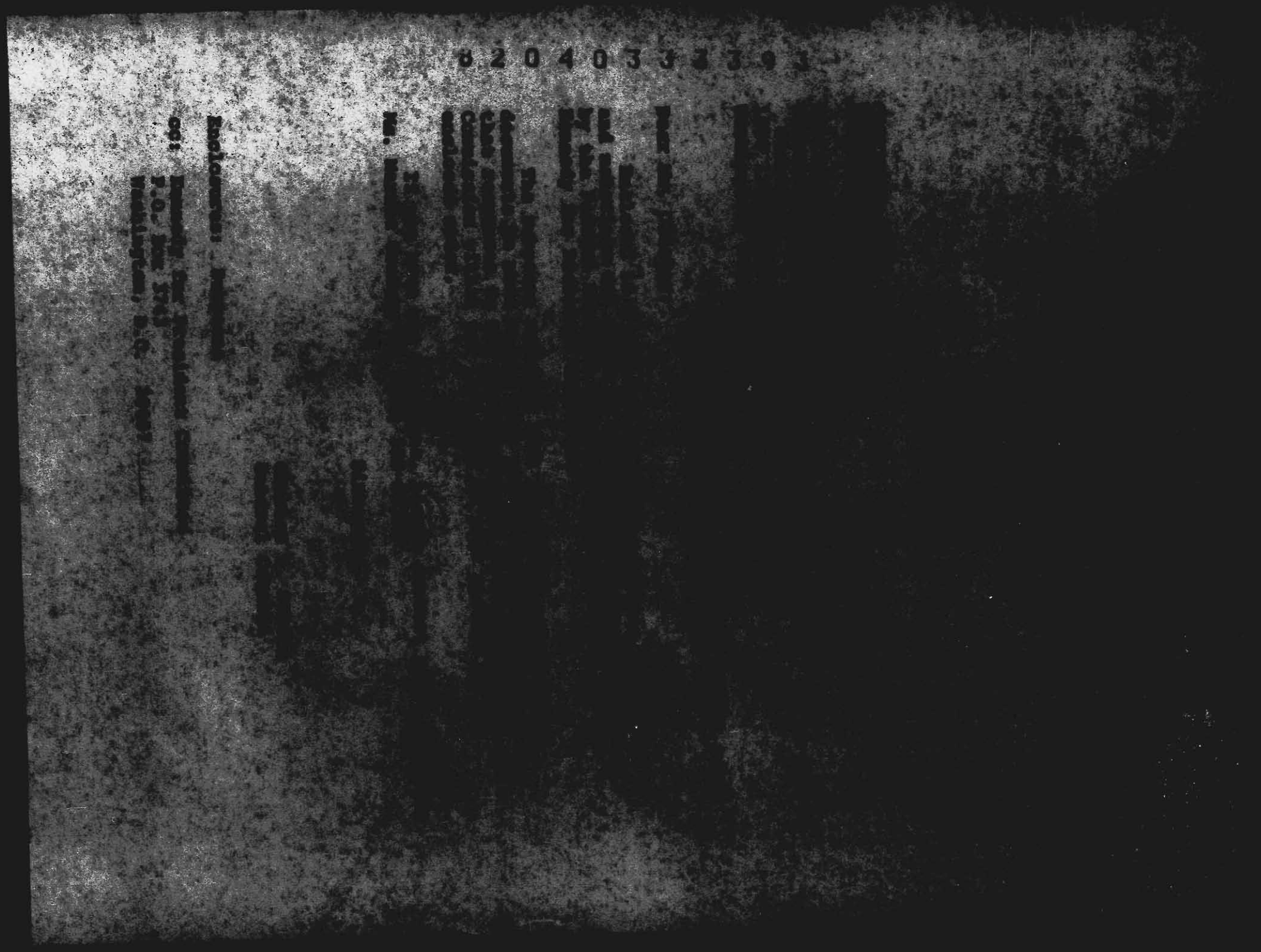
I have received the article described above.
SIGNATURE ☐ Addressee ☐ Authorized agent

4. DATE OF DELIVERY — POSTMARK

5. ADDRESS (Complete only if requested)

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

☆GPO: 1979-289-420



UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

# SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS AND ORDER TO ANSWER WRITTEN QUESTIONS

TO: Kennedy for President Committee
P. O. Box 3743
Washington, D.C. 20007

RE: MUR 1370

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), the Kennedy for President Committee is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the Kennedy for President Committee, the Kennedy for President Committee/ Puerto Rico, or of any of the officers, agents, staff members, volunteers or employees of these two committees. Production is to be made at the Office of General Counsel of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C., on March 27, 1981, at 10:00 a.m. In addition, the Kennedy for President Committee is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of this order.

Please produce the following in their entirety:

1. All monthly reports of expenditures supplied by the Kennedy for President Committee/Puerto Rico local field

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UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

**Subpoena Duces Tecum to Produce Certain Documents**

TO: Mr. Ruben Rivera Collado, Manager
Banco de Santander-Puerto Rico, San Juan Branch
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

As the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), the Banco de Santander-Puerto Rico, San Juan Branch is hereby ordered to produce for inspection and copying the documents listed below. Production is to be made within fifteen (15) days of your receipt the Commission's certification that the requirements of the Financial Privacy Act of 1978 have been complied with by the agency, by sending the documents designated herein by certified mail, to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Marsha Gentner.

1. Copies of all bank statements covering the period from January 18, 1980 to the present for customer account number . (Kennedy for President Committee/Puerto Rico, Miguel Lausell, signator).

2. Copies of deposit slips and all other documents and materials (including, but not limited to letters, memoranda, transfer slips, money orders and checks made payable to the drawer of the account or to cash, and any other written notations) relating to any deposit or transfer of funds into account number for the period from January 18, 1980 through the present.

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office to the treasurer or any other officer, staff member, employee, or volunteer of the Kennedy for President Committee. See Letter from William C. Oldaker to Charles N. Steele, dated December 2, 1980, at 2, ¶ 2 (hereinafter "Committee Letter").

2. All documents and materials (including but not limited to receipts, invoices, cancelled checks, monthly billing statements) relating to the payment by the Kennedy for President Committee/Puerto Rico of the following expenditures ( See 2 U.S.C. § 432(c)(5)):

a. $88,230.33 in cash to Ileana, Lopita and Howie

b. $11,000 on March 19, 1980, to David Sawyer

3(a) All records and accounts (including but not limited to cancelled checks and money orders, receipts, contributor cards, ledgers, lists, index cards, microfilm, and computer print-outs) of contributions received as a result of, or in connection with, the radio "marathon" held by the Kennedy for President Committee/Puerto Rico prior to the March 16, 1980, Democratic Presidential Primary in Puerto Rico (Committee Letter at 3-4). See 2 U.S.C. § 432(c)(1), (2) and (3).

(b) All such records and accounts of any contributions received which comprised any portion of the following deposits made into Kennedy for President Committee account [redacted] Banco de Santander - Puerto Rico, San Juan, Puerto Rico ( See Committee Letter at 2-3, and Affidavit of Miguel D. Lausell, attached thereto):

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| DEPOSIT DATE | AMOUNT |
|---|---|
| February 1980 | $4,000.00 |
| February 1980 | 2,000.00 |
| March 1980 | 20.00 |
| April 11, 1980 | 6,325.00 |
| June 13, 1980 | 365.00 |

If any document requested herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, along with the following information:

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please answer the following interrogatories:

A. Provide the date of the amended statement of organization filed with the Commission on which the Kennedy for President Committee disclosed the following depository as a Committee depository:

Banco de Santander-Puerto Rico
G.T.O. Box 2589
San Juan, Puerto Rico.

B. Provide the day of the month on which each of the deposits listed in document request no. 3(b), above, was made (unless otherwise designated in that list).

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C(1) Identify (by providing the account number, bank name and address, and name under which the account is held) each savings, checking or escrow account into which any funds received as a result of, or in connection with the radio marathon described in document request no. 3(a), above, were deposited, along with the date and amount of each such deposit.

(2) If any such funds referred to in part (1) of this interrogatory were not deposited into a checking, savings, or escrow account, please so state, supplying the amount of such funds, the name of each person in whose possession such funds were held, and whether such funds consisted of cash, money orders, checks, or drafts of any other type. See U.C.C. § 3-104.

D(1) Please provide the name and address of each person who made a contribution as a result of, or in connection with the radio marathon described in document request no. 3(a), above, along with the date and amount of each such contribution.

(2) If the information requested in part (1) of this interrogatory has been disclosed by the Kennedy for President Committee in a report filed with the Federal Election Commission, please also provide the date of each such report and the page on which the information in question appears.

E. Please provide the same information requested in Interrogatories (D)(1) and (2), above, for each contribution which comprised any portion of the deposits listed in document request no. 3(b), above.

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F(1) Please provide the date (day, month, and year) on which the following Kennedy for President Committee/Puerto Rico expenditures were made:

(i) $88,223.33 in cash to Ileana, Lopita and Howie

(ii) $11,000 to David Sawyer.

(2) If the expenditures listed in part (1) of this interrogatory were disclosed on reports filed by the Kennedy for President Committee with the Federal Election Commission, please provide the date of each such report and the page on which the information in question appears. See 2 U.S.C. SS 434(b)(4)(A) and 434(b)(5)(A).

G(1) Please provide the name(s) and address(es) of the person(s), bank(s), institution(s), or other entity from whom the cash referred to in Interrogatory F(1)(i), above, was obtained.

(2) If any portion of the funds referred to in part (1) of this interrogatory were originally obtained by the Kennedy for President Committee/Puerto Rico by means other than cash, please provide the name, address and position held with the Kennedy for President Committee of each person who converted such funds into cash, along with the name and address of the bank, institution, or other entity where such conversion into cash was made.

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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this 25th day of February, 1981.

JOHN WARREN McGARRY
Chairman

ATTEST:

Marjorie E. Emmons
Secretary to the Commission

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MUR 1070

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
) Pre-MUR 64
Kennedy for President Committee/ )
Puerto Rico )

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on February 23, 1981, the Commission decided by a vote of 4-0 to take the following actions regarding Pre-MUR 64:

1. Convert Pre MUR 64 into a MUR.

2. Find REASON TO BELIEVE that the Kennedy for President Committee violated 2 U.S.C. § 433(b)(6) and (c), and 11 C.F.R. §§ 102.2 (a)(1)(vi) and (2), and 103.1 by failing to timely report the Committee's Puerto Rican depository, Banco de Santander.

3. Find REASON TO BELIEVE that the Kennedy for President Committee violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i) by failing to report the contributions received by the Committee which comprised five deposits made in February, March, April, and June, 1980, into the account at Banco de Santander, and by failing to timely report contributions received from the Committee Puerto Rico radio marathon.

4. Find REASON TO BELIEVE that the Kennedy for President Committee violated 2 U.S.C. § 434 (b)(3)(A) and 11 C.F.R. § 104.3(a)(4)(i) by failing to designate in reports filed with the Commission, the identity of those persons whose contributions of $200 or more, each, comprised a portion of the five unreported deposits into the Committee account at Banco de Santander in February through June of 1980.

(Continued)

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5. Find REASON TO BELIEVE Kennedy for President Committee violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a) by failing to deposit receipts obtained from its radio marathon into an account at a registered campaign depository within ten days of such receipt.

6. Find REASON TO BELIEVE the Kennedy for President Committee violated 2 U.S.C. § 434(b)(4)(A) and 11 C.F.R. § 104.3(b)(2)(i) by failing to timely report its expenditures of $88,230.33 to Ileana, Lopita and Howie, and $11,000 to David Sawyer, Inc. Inc.; and REASON TO BELIEVE that the Committee violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3 (b)(4)(i) by failing to timely report the name and address of the persons to whom these expenditures were made, as well as the date, amount, and purpose of each such expenditure.

7. Find REASON TO BELIEVE the Kennedy for President Committee violated 2 U.S.C. §432 (h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) by failing to make its expenditures of $88,230.33 and $11,000 to Ileana, Lopita and Howie, and David Sawyer, Inc., respectively, by check drawn on an account at a registered Committee depository.

8. Send the letters and notifications as submitted with the First General Counsel's Report dated February 18, 1981.

9. Authorize the Subpoena Duces Tecum, and Order to Answer Written Questions (Attachments to the First General Counsel's Report dated February 18, 1981).

Commissioners Aikens, Reiche, Thomson, and Tiernan voted affirmatively for this matter.

Attest:

2/23/81
Date

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 2-18-81, 2:37
Circulated on 48 hour vote basis: 2-19-81, 11:00

0204033402

FEDERAL ELECTION COMMISSION

Cover memo (Horse to CAOS 2/22/01) + Commissioner Thomas's vote sheet with comments on McCurley

The above-described material was removed from this file pursuant to the following exemption provided in the Freedom of Information Act, 5 U.S.C. Section 552(b):

| | | | |
|---|---|---|---|
| ____ | (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 ____

date ____

FEC 9-21-77

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE mwe

FROM: MARJORIE W. EMMONS/MARGARET CHANEY mc

DATE: FEBRUARY 23, 1981

SUBJECT: COMMENTS REGARDING PRE-MUR 64 - First General Counsel's Report dated 2-18-81

Attached is a copy of Commissioner Thomson's vote sheet with comments regarding Pre-MUR 64.

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ATTACHMENT:
Copy of Vote Sheet

48 HOUR TALLY SHEET

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 FEB 20 P12: 17

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

Date and Time Transmitted: THURSDAY, 2-19-81
11:00

Commissioner McGARRY, AIKENS, TIERNAN, THOMSON, REICHE, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: MONDAY, FEBRUARY 23, 1981
11:00

AUTHORIZATION "SHEETS" ATTACHED

Pre- MUR No. 64 - First General Counsel's Report dated 2-18-81

( V ) I approve the recommendation

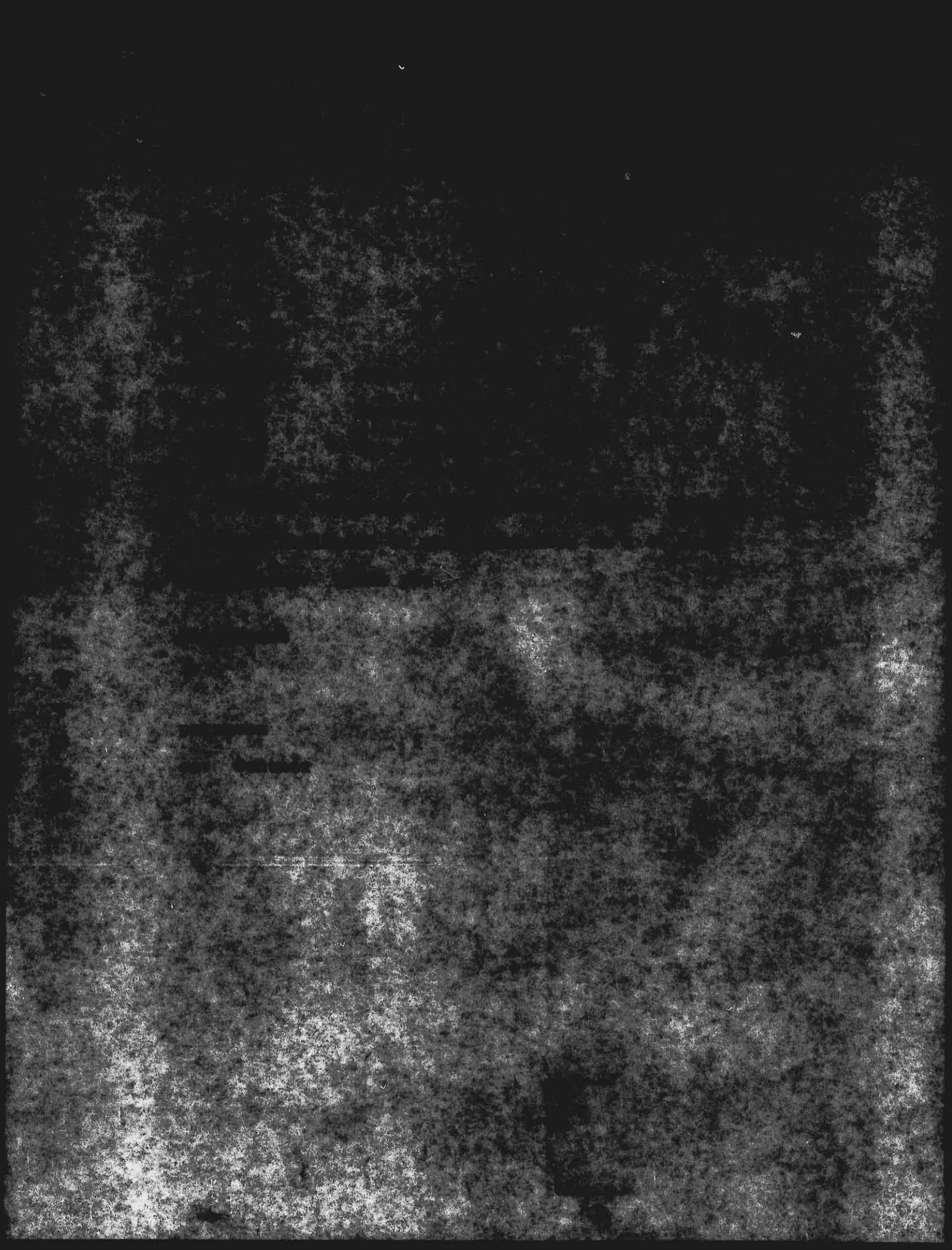
( ) I object to the recommendation

COMMENTS: Correct letter to Olsaker to include RTB for violation § 434(b)(5)(A). See page 7 of your report, 2nd paragraph, line 5.

Date: 2.20.81 Signature: [signature]

A DEFINITE VOTE IS REQUIRED AND ALL SHEETS SIGNED AND DATED. PLEASE RETURN ONLY THE VOTE SHEETS TO THE OFFICE OF THE COMMISSION SECRETARY NO LATER THAN THE DATE AND TIME SHOWN ABOVE.

8204033405



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

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

81 FEB 18 P2: 37

FIRST GENERAL COUNSEL REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 2/18/81

PRE MUR: 64
STAFF MEMBER(S)
Marsha Gentner

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: Kennedy for President Committee/Puerto Rico

RELEVANT STATUTE: 2 U.S.C. §§ 432(h)(1); 433(b)(6) and (C); 434(b)(2)(A), (3)(A), (4)(A) and (5)(A)
11 C.F.R. §§ 102.2(a)(1) and (2); 102.10; 103.1; 103.3(a); 104.3(a) and (b)

INTERNAL REPORTS CHECKED: All Kennedy for President Committee FEC Form 1 Reports filed with the Commission from February 1980 to the present

FEDERAL AGENCIES CHECKED: None

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## SUMMARY OF ALLEGATIONS

This matter stems from a letter from the Kennedy for President Committee, acknowledging that its Puerto Rico authorized committee violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), by failing to timely report certain contributions received and expenditures made, as well as the addition of a Committee depository in Puerto Rico.

## FACTUAL AND LEGAL ANALYSIS

### BACKGROUND

On December 3, 1980, the Commission received a letter from William C. Oldaker, counsel for the Kennedy for President Committee ("KFP" or "the Committee") concerning certain violations of the Act by the KFP Puerto Rico authorized affiliate that came to the attention of the Committee. (A copy of the letter is included as Attachment I to this report.) Specifically, the letter noted that a Puerto Rican depository of KFP had not been timely registered with the Commission as required by the Act, that five deposits made into this Puerto Rican depository were

not reported by the Committee in FEC disclosure reports, that two Committee expenditures in Puerto Rico were made by means other than a check from a registered depository, and that these latter two expenditures were not timely reported by the Committee. In addition, the letter acknowledges that KFP funds were raised in Puerto Rico by means of a radio "marathon", but that these funds received were not placed in a KFP registered depository as required by the Act, and that the contributions comprising them were not timely reported.

In keeping with the usual Commission practice, this matter was designated as a Pre-MUR, on December 4, 1980.

FACTUAL AND LEGAL ANALYSIS

A. KFP Puerto Rican Bank Account

Mr. Oldaker's letter on behalf of KFP indicates that a Committee bank account was opened on January 18, 1980 at the Banco de Santander (C. ., G.T.O. Box 2589, San Juan, Puerto Rico, but was not timely registered with the Commission as a Committee depository. 2 U.S.C. § 433(b)(6) requires a political committee to file a statement of organization with the Commission listing all depositories of the Committee. 2 U.S.C. § 433(c) further provides that any change in the information already submitted in a statement of organization shall be reported within ten days after the date of the change. See also 11 C.F.R. §§ 102.2(a)(1)(vi) and (2) and 103.1.. No such amended statement of organization designating Banco de Santander as a Committee depository was filed from January 18, 1980 (the date the KFP account was opened at that depository) to January 28, 1980. 1/ Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 433(b)(6) and (c) and 11 C.F.R. §§ 102.2(a)(1)(vi) and (2) and 103.1 by failing to timely report the Committee Puerto Rican depository to the Commission.

Mr. Oldaker's letter also acknowledges that five deposits of Committee raised funds, in the amounts and on the dates listed below, were made into the KFP Banco de Santander depository,

---

1/ The Committee did file an amended Statement of Organization on February 26, 1980, listing as a depository "Banco De Santauder, Sucurbal Ave., Morez Rivera, Hato Rey, Puerto Rico. See Attachment II. This may be the same depository as that referred to above, although the address is not the same as that listed in the Oldaker letter, or as that listed for the Banco de Santander in Hato Rey. See Attachment I at 2 and Attachment II. However, even if this is the same depository as the one in question, the statement of organization listing this depository was filed on February 26, 1980, well after the 10 day period set forth in 2 U.S.C. § 433(c).

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but were not reported to the Commission. These deposits were:

| DATE | AMOUNT |
|---|---|
| February, 1980 | $4,000.00 |
| February, 1980 | $2,000.00 |
| March, 1980 | 20.00 |
| April 11, 1980 | $6,325.00 |
| June 13, 1980 | 365.00 |

2 U.S.C. § 434(b)(2)(A) requires each political committee to file periodic reports disclosing the total amount of committee receipts in contributions from persons, for the reporting period and for the calendar year. See also 11 C.F.R. § 104.3(a)(3)(i). As the letter from Mr. Oldaker on behalf of KFP admits that the contributions comprising the five deposits listed above were not disclosed in Committee reports filed with the Commission (see Attachment I at 3), the Office of General Counsel recommends that the Commission find there is reason to believe that KFP violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i). 2/

In addition, documents submitted on behalf of the Committee (attached to Mr. Oldaker's letter) show that some of the contributions comprising the April 11, 1980 deposit into the account

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2/ The Act nd regulations also require each political committee to keep a record of all contributions received, including the name, address, date of receipt and amount for each contribution in excess of $50 received by the committee, and the identitication of each contributor giving in excess of $200 to the committee. See 2 U.S.C. § 432(c)(1), (2), and (3); 11 C.F.R. § 102.9(a)(1) and (2). As there is no indication from Mr. Oldaker's letter that such records were not maintained by the Committee, the Office of General Counsel has declined to recommend that the Commission make a finding against KFP with respect to these statutory and regulatory provisions. However, the attached proposed document requests and interrogatories, which the Office of General Counsel recommends the Commission authorize, seek such records and information, and (if authorized and) if the Committee responds by indicating it is unable to produce those materials, the Office of General Counsel would immediately forward a further recommendation to the Commission that it find there is reason to believe the Committee violated 2 U.S.C. § 432(c)(1), (2), and (3) and 11 C.F.R. § 102.9(a)(1) and (2).

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at Banco de Santander were in excess of $200. See Attachment I at KFP Exhibit A. As the letter submitted on behalf of the Committee acknowledges that these contributions were not reported by KFP to the Commission, the Office of General Counsel recommends that the Commission find there is reason to believe the Committee also violated 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4)(i) by failing to designate in reports filed with the Commission, the identity (full name, mailing address, occupation, and name of employer, 11 C.F.R. § 100.12) of each person that made a contribution in excess of $200 to the Committee. 3/

B. KFP Puerto Rico Fundraising Event

Some time before the March 16, 1980, Puerto Rican Democratic primary, KFP/Puerto Rico held a radio "marathon". This Committee fundrasing event is described as a day long radio program featuring political and entertainment celebrities in an effort to obtain pledges and contributions for the campaign. During, as well as prior to the radio marathon, contributions were received by KFP/Puerto Rico at various predetermined locations, including Puerto Rican street corners. According to the letter submitted on behalf of the Committee, this marathon raised $99,233.33. See Attachment I at 4.

2 U.S.C. § 432(h)(1) provides that all receipts of a political committee must be deposited into an account at a designated campaign depository. See also, 11 C.F.R. § 103.3(a) (such deposit must be made within ten days of the committee's receipt of the funds). As acknowledged by the Committee, KFP/Puerto Rico did not deposit

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3/ Mr. Oldaker's letter contends that none of the contributions which comprised the five deposits listed above consisted of a cash contribution in excess of $50. See Attachment I at 3. The deposit slip evidencing the KFP June 13, 1980 deposit, and the supporting documentation supplied with respect to the April 11, 1980 deposit verify that no cash contribution in excess of $50 formed a part of those Committee deposits. See Exhibits B and A, respectively, of Attachment I. However, the Commission does not have possession of any such verification for the other three deposits KFP admittedly failed to report, except for the sworn statement to that effect from Miguel D. Lausell, Puerto Rican Campaign Director for KFP. See Attachment I. In that the Commission has no evidence at this time indicating KFP/Puerto Rico received any cash contributions in excess of $50, the Office of General Counsel declines to make a recommendation in this Report that the Commission find there is reason to believe the Committee violated the Act by such actions. Should the investigation (if authorized) into these deposits present evidence of such a violation, the Office of General Counsel would immediately make such a recommendation to the Commission.

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the $99,233.33 received from the radio marathon into a Committee account at a designated depository. See Attachment I at 4. Accordingly, the Office of General Counsel recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a).

The letter from Mr. Oldaker on behalf of the Committee also acknowledges that the contributions comprising the $99,233.33 received from the radio marathon were not timely reported by the Committee. Id. As previously noted, this information is required to be reported by the provisions in 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i). Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe KFP also violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(i) by failing to timely report the total amount of Committe receipts in contributions from persons for the reporting period during which the KFP/Puerto Rico radio marathon was held. 4/

Finally, the letter submitted on behalf of KFP states that the money received from the radio marathon was paid to two vendors of the Committee. KFP/Puerto Rico made a payment of $88,230.33, in cash, to the advertising firm of Ileana, Lopita and Howie of Puerto Rico. This payment was apparently made to cover the cost of Committee radio and television commericals. See Attachment I at 4, and Affidavits, attached thereto, of Julio Hector Morales and Miguel A. Rivera. In addition, a total payment of $11,000, in the form of bank checks issued by Banco Popular de Puerto Rico 5/, was made by KFP/Puerto Rico on March 19, 1980, to David Sawyer of David Sawyer, Inc., apparently for production costs in connection with Committee commercials. Id. (Copies of these bank checks were included as exhibits to Attachment I.)

The Committee has acknoweledged that it did not timely report these two expenditures to Ileana, Lopita and Howie and David Sawyer, Inc., respectively, as is required by the Act and the regulations. See Attachment I at 4. Thus, the Office of General Counsel recommends that the Commission find there is reason to believe that KFP violated 2 U.S.C. § 434(b)(4)(A) and 11 C.F.R. § 104.3(b)(2)(i) for failing to report Committee disbursements made during the March 1980, reporting period. In that these two Committee expenditures were both in excess of $200, the Office of General Counsel also recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) for failing to

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4/ See also nn. 2, 3, supra.

5/ Banco Popular de Puerto Rico was not designated as a KFP campaign depository on reports filed by the Committee with the Commission.

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timely report the name and address of the persons to whom these expenditures were made, as well as the date, amount, and purpose of each of the two expenditures. Furthermore, as 2 U.S.C. § 432 (h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) require all political committee disbursements 6/ to be made by check drawn on an account in a registered campaign depository, and as KFP did not make the two expenditures in question by such method, the Office of General recommends that the Commission find there is reason to believe KFP violated these statutory and regulatory provisions, as well.

Inasmuch as the above analysis recommends that the Commission make certain reason to believe findings against respondent, the Office of General Counsel also recommends that the Commission convert this Pre MUR into a MUR.

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RECOMMENDATIONS

1. Convert Pre MUR 64 into a MUR.

2. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 433(b)(6) and (c), and 11 C.F.R. §§ 102.2(a)(1)(vi) and (2), and 103.1 by failing to timely report the Committee's Puerto Rican depository, Banco de Santander.

3. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i) by failing to report the contributions received by the Committee which comprised five deposits made in February, March, April and June, 1980, into the account at Banco de Santander, and by failing to timely report contributions received from the Committee Puerto Rico radio marathon.

4. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3 (a)(4)(i) by failing to designate in reports filed with the Commission, the identity of those persons whose contributions of $200 or more, each, comprised a portion of the five unreported deposits into the Committee account at Banco de Santander in February through June of 1980.

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6/ Exempted from the provisions of 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) are petty cash expenditures of less than $100. See 2 U.S.C. § 432(h)(2).

5. Find reason to believe Kennedy for President Committee violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a) by failing to deposit receipts obtained from its radio marathon into an account at a registered campaign depository within ten days of such receipt.

6. Find reason to believe the Kennedy for President Committee violated 2 U.S.C. § 434(b)(4)(A) and 11 C.F.R. § 104.3 (b)(2)(i) by failing to timely report its expenditures of $88,230.33 to Ileana, Lopita and Howie, and $11,000 to David Sawyer, Inc.; and reason to believe that the Committee violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) by failing to timely report the name and address of the persons to whom these expenditures were made, as well as the date, amount, and purpose of each such expenditure.

7. Find reason to believe the Kennedy for President Committee violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) by failing to make its expenditures of $88,230.33 and $11,000 to Ileana, Lopita and Howie, and David Sawyer, Inc., respectively, by check drawn on an account at a registered Committee depository.

8. Send the attached letters and notifications.

9. Authorize the attached Subpoena Duces Tecum, and Order to Answer Written Questions.

Attachments

I. Letter from William C. Oldaker (36 pages)
II. Amended Statement of Organization of Kennedy for President Committee (2/26/80). (2 pages)
III. Subpoena Duces Tecum to Banco de Santander (4 pages)
IV. Notice of Subpoena to Kennedy for President Committee (5 pages)
V. Order to Answer Written Questions to KFP (8 pages)
VI. Letter and General Counsel's Legal and Factual Analysis to KFP (7 pages)

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WILLIAM C. OLDAKER
ATTORNEY AT LAW
1000 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20036
TELEPHONE
CABLE ADDRESS: "CHALORAY"

RECEIVED
80 DEC 3 P5:52
GENERAL COUNSEL

December 2, 1980

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Kennedy for President Committee/
Puerto Rico

Dear Mr. Steele:

During the course of the presidential primary campaign in Puerto Rico, several unintentional violations of the Federal Election Campaign Act of 1971, as amended, occurred. This letter sets forth the errors which led to the unintentional violations of the Act in the hopes of reaching an amicable and voluntary resolution of the problem.

In order to fully understand the event, which took place during the Democratic presidential campaign in Puerto Rico, it is necessary to understand the unique part which the Commonwealth of Puerto Rico plays in our political structure. Further, it is necessary to understand the procedure which is ordinarily followed by the national campaign office in regard to all receipts and expenditures.

The first time that individuals in Puerto Rico participated in a federal primary was in 1976, during the presidential primary contest. Since Puerto Rico elects only a non-voting Resident Commissioner to Congress, little attention has ever been paid by the residents of Puerto Rico to the Federal Election Campaign Act. Parties themselves in Puerto Rico are somewhat blurred in the traditional sense. There is no Democratic or Republican party, as we know it, in the rest of the country. There are two principal parties in Puerto Rico which traditionally vie for the vast majority of the seats in the Puerto Rican legislature as well as for the gubernatorial race. These parties are the New Progressive Party and the Popular Democratic Party. Three other parties play a lesser role in the Commonwealth's political structure. The two

Attachment I

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principal parties differ on many traditional Puerto Rican issues, but are split most decisively on the status of Puerto Rico. The Popular Democratic Party is in favor of Puerto Rico continuing in its commonwealth status, while the New Progressive Party wishes the Commonwealth to apply for statehood. Traditionally, both of the major parties have been aligned with the Democratic National institutions. In the 1980 presidential primary campaign, the Popular Democratic Party supported Edward M. Kennedy and the New Progressive Party supported Jimmy Carter. It should be noted that the New Progressive Party also supported a Republican candidate in the Republican primary which was held a short time before the Democratic primary. The presidential primary on the Democratic side of Puerto Rico thus became somewhat of a test vote between the two antagonistic factions of the Democratic National structure. This led to a strong local interest in the presidential primary, with ramifications going beyond the primary victory of one presidential candidate.

Procedures as followed by The Kennedy for President Committee on a fairly uniform basis nationwide were that all contributions would be deposited into the national depository which was from October 29, 1979 until April 1, 1980, the National Savings & Trust of Washington, D.C., and from April 1, 1980 until the present time, the District of Columbia National Bank. Money collected locally in the states was sent to Washington for deposit in a central depository. In many cases, an equivalent amount of money was returned to the local level to be spent by the local campaign on primary activities in that state. The purpose of this procedure was to allow the treasurer to review all receipts and report them correctly to the Federal Election Commission. The general procedure on expenditures was that each field office was to pay all bills locally incurred from the local depository. No cash expenditures were to be made other than those specifically authorized as "Petty Cash" expenditures. Each local field office was required to send the treasurer a monthly report of all of their expenditures.

A checking account for The Kennedy for President/ Puerto Rico campaign was opened on January 18, 1980, at the Banco de Santander, G.T.O. Box 2589, San Juan, Puerto Rico, Account No. [redacted]. The sole signator on this account was Miguel Lausell, the Director of the Puerto Rican campaign.

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Unfortunately, this checking account was not timely registered with the Federal Election Commission.

During the course of the campaign, in several instances, local officials directly deposited funds which were raised locally into the account located at the Banco de Santander. The Commission may wish to take note of the fact that the mail communication system to the Commonwealth of Puerto Rico from Washington, D.C. is at best a very lengthy procedure. Local officials in Puerto Rico, realizing this, felt that at various times during the campaign it was simply too cumbersome to forward these locally collected receipts to Washington and to await their return to the local account. In at least one instance, the local checking account had been overdrawn and it was necessary to make a deposit immediately. Our records currently indicate that five deposits were made locally into the account at the Banco de Santander. These local deposits total $12,710. This money was collected locally, oftimes evidenced by check and signature card, and in no case was cash in excess of $50 accepted from any individual. Because of a lack of understanding at the local level, these deposits which were made into the Banco de Santander from local campaign funds were never reported to the national office in Washington, and consequently were not included in the monthly Federal Election Commission reports, resulting in an unintentional violation of 11 C.F.R. § 104.3.

Another problem inadvertently arose in the campaign in Puerto Rico when the local campaign used a fundraising technique which is somewhat unique to the Commonwealth of Puerto Rico. This type of fundraising technique is loosely called a marathon. The hallmark of this type of activity is a one-day radio or TV blitz where, for a full day on a number of radio and/or TV stations, a show is put on by various celebrities, both political and from the entertainment world. During this marathon, which is broadcast throughout the Commonwealth, money is brought to various locations which have been predetermined. A running total of the contributions that have been made is continuously broadcast. Also, on almost every busy street-corner in Puerto Rico, there is a person who is soliciting mass contributions to the marathon, sometimes handing out literature and requesting that donations be dropped into a bucket. In many locales throughout the Commonwealth, persons are assigned quotas to raise for the marathon. These people will, in some instances, start raising the money a short period of time prior to the radio marathon, and then on the date of the marathon, turn these small contributions in to their local coordinator.

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During the presidential primary campaign, The Kennedy for President Committee in Puerto Rico held just such an island-wide radio marathon to raise funds for the primary effort in Puerto Rico. Several problems rose in connection with this island-wide radio marathon which raised $99,233.33. The radio marathon was held shortly before the date of the primary in Puerto Rico. Because of the short period of time and in view of the need for additional radio and television media, the local campaign officials felt compelled to keep the money locally. A deposit for time buys was made with a local advertising agency, Ileana, Lopita and Howie. Giulio Hector Morales, an employee of Ileana, Lopita and Howie, acknowledged receipt of $88,230.33 in cash. The remainder of the money raised through the radio marathon, $11,000, was paid to David Sawyer, Inc., for the production costs in connection with these commercials. Mr. Sawyer was paid in the form of bank checks issued by the Banco Popular de Puerto Rico (see exhibits, attached).

Since there was no established procedure set forth by the national committee for handling such local payments, the local committee inadvertently erred in not reporting these expenditures to the national office; consequently, no report disclosing these contributions and expenditures were timely made with the FEC. Further, the local committee failed to deposit these contributions into a depository as required by 11 C.F.R. § 103.2.

The Puerto Rico campaign officials misunderstood the FEC's accounting and reporting requirements and, because of their special local situation, felt they could not adhere to the normal procedure established by the national office. We therefore did not become aware of these transactions until informed by third parties after the event. The national office then took steps to ascertain the full facts of the situation in an effort to bring the Puerto Rico committee into compliance. These steps included requests for information on the committee's receipts and expenditures and a trip by campaign counsel to Puerto Rico to investigate the matter. Due to the remoteness of Puerto Rico and difficulties in making the local officials fully understand what information was required, we were able to obtain affidavits from these officials only recently. The affidavits of Miguel D. Lausell, Campaign Director of the Puerto

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Rico Kennedy for President Committee, and Miguel A. Rivera, a local fundraiser, are enclosed. (Please note that due to a typographical error the date given in Sr. Rivera's affidavit for the opening of the Banco de Santander account is June 18, 1980, instead of January 18, 1980.)

It is our strong feeling that though these violations are not de minimus in nature, they occurred through the lack of understanding of various well-intentioned persons in the Commonwealth of Puerto Rico. It is our hope that these disclosures will commence discussions with the aim of amicably settling these inadvertent violations of the Federal Election Campaign Act and the Federal Election Commission's regulations.

Sincerely,

William C. Oldaker

Enclosures

WCO:mlk

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# SWORN STATEMENT

I, MIGUEL D. LAUSELL, of legal age, married, a lawyer and a resident of Guaynabo, Puerto Rico, as Campaign Director of the Kennedy for President Committee in Puerto Rico, do hereby swear:

1. That my personal circumstances are the above-mentioned.

2. That during the months of February, March, April and June, 1980 deposits were locally made into the Kennedy for President-Puerto Rico account.

3. A checking account was opened for the Kennedy for President-Puerto Rico on June 18, 1980 at Banco de Santander-Puerto Rico San Juan, Puerto Rico.

4. That during the course of the campaign numbers of small cash contributions were received by the Kennedy For President Committee in Puerto Rico.

5. That none of these contributions from individuals exceeded $50.00 in cash.

6. That in many instances, contributions were made by checks accompanied by signature cards.

7. That during the campaign it was necessary to deposit some of these contributions in our account at Banco de Santander-Puerto Rico.

8. That during the month of February two deposits

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DEPOSITED WITH

BANCO SANTANDER PUERTO RICO

DEPOSITADO CON

PARA ACREDITAR A
FOR ACCOUNT OF

Kennedy Plato Benitez

USE LETRA DE MOLDE PLEASE PRINT

LA CUENTA PERTENECE A
ACCOUNT IS CARRIED AT

Fomento Branch

NUMERO DE CUENTA - ACCOUNT NUMBER

6/12/ 19

| | DOLLARS | CTS |
|---|---|---|
| EFECTIVO CASH | | |
| DETALLE LOS CHEQUES LIST CHECKS 1 | 136 | 00 |
| 2 | 100 | 00 |
| 3 | 15 | 00 |
| 4 | 14 | 00 |
| 5 | 40 | 00 |
| 6 | 40 | 00 |
| 7 | | |
| 8 | | |
| TOTAL | 365 | 00 |

Al endosar sus cheques incluya su número de cuenta. Endorse your checks including your account number.

CUSTOMER'S C

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11

127.06
108.—
19.06

Señora
Banco Santander

BANCO DE SANTANDER - PUERTO RICO
TELLER
NO. 4
JUN 13 1980
AUDIT

# BANCO DE SANTANDER - PUERTO RICO

DIRECCION POSTAL
G.P.O. BOX 2589
SAN JUAN, PUERTO RICO 00936

CABLES. BANSANPCO
TELEX. ITT 3450062 BADEPPR
ITT 3450034
RCA 3859497
RCA 3252428
WESTERN UNION 2654299

April 11, 1980

To whom may it concern:

I hereby certify that on this date we have credited the Account No. [redacted] - Kennedy for President in the amount of $6,325.00 for checks deposited as described in Exhibit "A" attached hereto.

Sincerely,

Miguel Morales
Credit Manager

imr/

Para que esta carta sea válida todas sus páginas deberán estar firmadas

0 2 0 4 0 3 3 3 4 2 2

MEMBER FEDERAL DEPOSIT INSURANCE CORPORATION

8 2 0 4 0 3 3 3 4 3

DEPOSITED WITH

BANCO DE SANTANDER
PUERTO RICO

DEPOSITADO CON

PARA ACREDITAR A
FOR ACCOUNT OF

LA CUENTA PERTENECE A
ACCOUNT IS CARRIED AT

NUMERO DE CUENTA ACCOUNT NUMBER

EFECTIVO
CASH

1
2
3
4
5
6
7
8

TOTAL $

Al endosar sus cheques incluya su número de cuenta. Endorse your checks including your account number.

CUSTOMER'S COPY

LIC. NO. 905087
BOX 972
SAN JUAN, P.R. 00902

101-702
215

Cash
write
DOLLARS

THE ROYAL BANK OF CANADA
704 TETUAN STREET
SAN JUAN, PUERTO RICO

FOR
⑆021502024⑆ 865

1347

LUIS O. RODRIGUEZ Y/O
MARIA L. RODRIGUEZ
COND. EL MIRAMAR APTO. 3-A
AVE. MIRAMAR ESQ. OLIMPO-SANTURCE, P.R. 00909

101-705
215

PAY TO THE ORDER OF

DOLLARS

BANCO de San Juan

FOR
⑆021502053⑆

8204033334 24

JULIO MORALES
SAN JORGE NO. 259
SANTURCE, P.R. 00912

2273

101-205
215

PAY TO THE ORDER OF

DOLLARS

BANCO de San Juan

FOR
⑆021502053⑆

653

J.H. Y/O MICHELLE MARTIN
G.P.O. BOX 3036
SAN JUAN, P.R. 00936

5/13 19 80

101-204
215

Pay to the Order of

Dollars

CITIBANK
Citibank, N.A.

⑆021502011⑆

FLO[illegible]CE C. MENDEZ
[illegible]ARTAMO 708
[illegible]REY, P.R. 00918

March 6 1980 101-232/215

Pay to the Order of [illegible] $20.00

[illegible] Dollars

BANCO COOPERATIVO DE PUERTO RICO
HATO REY, PUERTO RICO

For
⑆021502383⑆

---

1801

LCDO. C. ARZUAGA ALGARIN Y/O
AIDA M. ARZUAGA
CALLE 4 NO. 92 VILLAMAR
ISLA VERDE, P.R. 00913

May 16 1980 101-209/215

PAY TO THE ORDER OF Comité Pro Kennedy $20.00

Veinte 00/100 DOLLARS

BANCO DE PONCE
ISLA VERDE
CAROLINA, PUERTO RICO

FOR
⑆021502095⑆

Lcdo. C. Arzuaga

---

JUAN H. IBAÑEZ Y/O
CARMEN S. IBAÑEZ

813

May 20 1980 101-205/215

PAY TO THE ORDER OF Comité Kennedy Pro Presidente $ 20.00

Veinte dólares con 00/100 DOLLARS

Banco de San Juan
SANTURCE, P. R.

FOR
⑆021502053⑆

Carmen S. Ibañez

---

VICTORIA RODRIGUEZ

No. 19

Mayo 17 1980 101-280/215

PAY TO THE ORDER OF Comité Kennedy Pro $ 20.00

Veinte 00/100 DOLLARS

Scotiabank de Puerto Rico
1007 Ponce de Leon Avenue
Santurce, Puerto Rico

FOR
⑆021502054⑆

Victoria Rodriguez

---

⑆204033334255

BEATRICE PALDRICH

PAY TO THE ORDER OF Cash $ 20.00

Twenty 2 00/100 DOLLARS

BANCO DE PONCE

FOR Jackie

⑆021502095⑆

MARISARA PONT 1311

101-201/215

PAY TO THE ORDER OF DOLLARS

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

FOR

⑆021502011⑆

LUZ RAQUEL B. DE PRADO 627

101 201/215

PAY TO THE ORDER OF DOLLARS

BANCO POPULAR DE PUERTO RICO
MIRAMAR, PUERTO RICO

FOR

⑆021502011⑆

RITA SOLA No.

101-201/215

PAY TO THE ORDER OF $ DOLLARS

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

FOR

⑆021502011⑆

⑆204033334266

101 201
215

PAY TO THE ORDER OF _____ $ _____

_____ DOLLARS

BANCO POPULAR DE PUERTO RICO
BANCO POPULAR CENTER BRANCH
SAN JUAN, PUERTO RICO

FOR _____

⑈021502011⑈

---

LCDO. JOSÉ E. FERNÁNDEZ SEIN
Y/O PATRIA DEL CARMEN
FERNÁNDEZ

3266

13 marzo 1980 101-201 / 215

PAY TO THE ORDER OF Ed Kennedy for President $ 20.00

Veinte dólares DOLLARS

BANCO POPULAR DE PUERTO RICO
MIRAMAR, PUERTO RICO

FOR Patria del C. Fernández

⑈021502011⑈

---

JOSE A. PURAS RIVERA

757

3-11 1980 101-201 / 215

PAY TO THE ORDER OF Kennedy for President $ 20.00

Veinte con 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
STOP 15 FERNANDEZ JUNCOS AVE. BRANCH
SANTURCE, PUERTO RICO

FOR _____

⑈021502011⑈

---

VIRTUDES G. DE SILVA

No. 150

Marzo 11 1980 101-201 / 215

PAY TO THE ORDER OF Kennedy for President $ 20 00/100

veinte con 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
MIRAMAR, PUERTO RICO

FOR Virtudes G. de Silva

⑆0204033334227

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

PAY TO THE ORDER OF Kennedy for President 1 20.00

Twenty and no/100 DOLLARS

FOR Wilma Pietri

⑆021502011⑆

---

923

JORGE LUIS VEGA/HILDA PIETRI DE VEGA
CALLE 7, B4-14
ALTURAS DE TORRIMAR
GUAYNABO, P.R. 00657

March 10, 1980

101-206/215

PAY TO THE ORDER OF Kennedy for President $20.00

Twenty and no/100 DOLLARS

THE CHASE MANHATTAN BANK
National Association
Santurce Branch, Santurce, Puerto Rico
6-2

FOR Hilda Pietri de Vega

⑆021502066⑆

---

CARLOS GAZTAMBIDE ACOSTA Y/O
ROSITA JANER DE GAZTAMBIDE
CALLE MADRID 316, TORRIMAR TEL.
GUAYNABO, PUERTO RICO

No. 1156

March 10, 1980 101-201/215

PAY TO THE ORDER OF Kennedy for President Committee $20.00

Joint CO XX DOLLARS

BANCO POPULAR DE PUERTO RICO
HYDE PARK BRANCH
RIO PIEDRAS, PUERTO RICO

FOR

⑆021502011⑆

---

457

IRMA CAMPILLO

March 1980 101-201/215

PAY TO THE ORDER OF Citizens Kennedy Steering Committee $ 20.00

Twenty and 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
AGUADILLA, PUERTO RICO

FOR

⑆021502011⑆

⑆020403334288

BANCO POPULAR DE PUERTO RICO

⑆021502011⑆

M.P. SERBIA

112

9/11 1980 101 701 / 715

PAY TO THE ORDER OF Comite Ted Kennedy Presidente $ 20.00

veinte dolares con 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
CONDADO BRANCH
SANTURCE, PUERTO RICO

FOR Entrada Acto del Pueblo con Kennedy

⑆021502011⑆

MANOLITA APARICIO NORIEGA

APARTADO 9391
SANTURCE, P.R. 00908

219

Marzo 11 1980 101.205 / 215

PAY TO THE ORDER OF Kennedy Presidente $ 20.00

veinte 00/100 DOLLARS

BANCO de San Juan
SANTURCE, P. R.

FOR C. Victoria

⑆021502053⑆

Manolita Aparicio Noriega

CARMEN MARIA AGRESAR

0566

P.O. BOX 11620 CAPARRA HEIGHTS STA.
SAN JUAN, P.R. 00922

1047

Marzo 11 1980 101.202 / 215

PAY TO THE ORDER OF Kennedy for President $ 20.00

Twenty 00/100 DOLLARS

THE ROYAL BANK OF CANADA
AVE. JOHN F. KENNEDY BRANCH
SAN JUAN, PUERTO RICO

⑆0204033334229

(2)

CALLE [redacted] VILLA [redacted]
[redacted], P.R. 00913

PAY TO THE ORDER OF [redacted] $ [redacted] DOLLARS

BANCO DE PONCE
AVENIDA DE DIEGO
URBANIZACION SAN FRANCISCO
RIO PIEDRAS, PUERTO RICO

FOR [redacted]

⑆021502095⑆

---

FERNANDO AGRESAR Y/O
LAURA DONATE DE AGRESAR
P.O. BOX 11620 [redacted]

892

[redacted] 19[redacted] 101-202/215

Pay to the Order of [redacted] $ 30.00

[redacted] 00/100 Dollars

BANCO DE PONCE
CAPARRA SHOPPING CENTER
AVE. F. D. ROOSEVELT
CAPARRA HEIGHTS, PUERTO RICO

For [redacted]

⑆021502095⑆

---

RAQUEL N. DE IGLESIAS

1058

[redacted] 19[redacted] 101-201/215

PAY TO THE ORDER OF [redacted] $ [redacted]

[redacted] DOLLARS

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

FOR [redacted]

⑆021502011⑆

---

CARLOS R. RIOS OR
SONIA P. DE RIOS

No. [redacted]

[redacted] 19[redacted] 101-202/215

PAY TO THE ORDER OF [redacted] $ [redacted]

[redacted] DOLLARS

THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

820403334330

(25)

DRA. [illegible] Y/O AN[illegible]ISA ORAMIRIZ RODON

1033

0 2 0 4 0 3 [illegible] 19 50 101-205 215

PAY TO THE ORDER OF [illegible] $ 10.00

[illegible] 00/100 DOLLARS

BANCO de San Juan
BAYAMON, P. R.

FOR [illegible]

⑆021502053⑆

---

ISABEL M. CESTERO 191

[illegible] 19 50 101-206 215

PAY TO THE ORDER OF [illegible] $ 15.00

[illegible] DOLLARS

THE CHASE MANHATTAN BANK
National Association
Cocoma Branch, Cocoma, Puerto Rico

FOR [illegible]

⑆021502066⑆

---

MARÍA TERESA G. MATOSANTOS 1014
CALLE OVIEDO NO. 38
TORRIMAR
GUAYNABO, P.R. 00657

[illegible] 19 [illegible] 101-201 215

PAY TO THE ORDER OF [illegible] $ [illegible]

[illegible] DOLLARS

BPPR
BANCO POPULAR DE PUERTO RICO
SAN PATRICIO PLAZA BRANCH
SAN JUAN, PUERTO RICO

FOR [illegible]

⑆021502011⑆

---

LCDO. RUBÉN RODRÍGUEZ ANTONGIORGI
LUCY M. DE RODRÍGUEZ 385
G.P.O. BOX 3507
SAN JUAN, P.R. 00936

[illegible] 19 [illegible] 101-205 215

PAY TO THE ORDER OF [illegible] $ 10.

[illegible] DOLLARS

THE CHASE MANHATTAN BANK
16-61

FOR [illegible]

⑆021502066⑆

ROSADO

0 2 0 4 0 3 3 3 4 3 2

101 201
215

PAY TO THE ORDER OF

$

DOLLARS

BANCO POPULAR DE PUERTO RICO

FOR

⑈021502011⑈

DR. JOSÉ RAÚL AYALA CUERVOS
Y/O LUZ E. RIVERA DE AYALA

1541

101 201
215

PAY TO THE ORDER OF Kennedy for President $ 10.00

DOLLARS

BANCO POPULAR DE PUERTO RICO
ITURRO AVENUE BRANCH
CAPARRA TERRACE, PUERTO RICO

FOR

⑈021502011⑈

(21)

8 2 0 4 0 3 3 3 4 3

NO 1-024-065093 March 11, 1980 $200.00

PAY $200.00

TO THE ORDER OF

—SIGNATURE NOT REQUIRED— Hector Cuba Cortés

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

⑈024065093⑈ ⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other $200

Name Cesar Andreu

Address Garden Hills, Guaynabo

City & State Puerto Rico Zip Code 00657

Federal law requires us to request the following information

Occupation Lawyer

Name of employer —

Principal place of business Cuesta Sepulveda, Hatillo

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account I understand that federal law prohibits corporate contributions

Signature

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission Washington D C

LICENCIADO MARIO M. ORONOZ
CUENTA BUFETE
SUITE 1105 EDIFICIO BANCO POPULAR CENTER
HATO REY, P. R. 00918

No. 2515

101-201
215

March 11 19 80

PAY TO THE ORDER OF KENNEDY FOR PRESIDENT COMMITTEE $100:00

******ONE HUNDRED********** 00/100 DOLLARS

LICENCIADO MARIO M. ORONOZ
CUENTA BUFETE

AUTHORIZED SIGNATURE

BANCO POPULAR DE PUERTO RICO
Hato Rey Puerto Rico
San Juan, Puerto Rico

⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☒ $100 ☐ $50 ☐ $15 ☐ Other

Name MARIO ORONOZ

Address

City & State Zip Code

Federal law requires us to request the following information

Occupation

Name of employer

Principal place of business

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account I understand that federal law prohibits corporate contributions

Signature

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

LEO CABRANES

No. 101

0 2 0 4 0 3 3 3 Hato Rey, P.R. 19 80 101 209 215

PAY TO THE ORDER OF Cámara Pro-Kennedy $ 100.00

Cien ---------- 00/ DOLLARS

BANCO POPULAR DE PUERTO RICO
SIGHT BRANCH
SANTURCE, PUERTO RICO

FOR
⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☒ $100 ☐ $50 ☐ $15 ☐ Other

Name Leo Cabranes
Address Ave. Ponce de Leon 1510
City & State Santurce, P.R. Zip Code

Federal law requires us to request the following information
Occupation Director Ejecutivo Asociación de Ahalde
Name of employer
Principal place of business

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Federal law prohibits corporate contributions

ANTONIO GONZALEZ FLORES Y/O
ZULMA M. GONZALEZ
MAGNOLIA FF-11 EXT. BORINQUEN GDNS.
RIO PIEDRAS, P.R. 00926

1526

Mar 14 19 80 101 209 215

PAY TO THE ORDER OF Jr Kennedy for President $ 350=

Dos cientos cincuenta ---------- DOLLARS

BANCO DE PONCE
SUCURSAL EL SENORIAL
EL SENORIAL PLAZA
RIO PIEDRAS, PUERTO RICO

FOR
⑆021502095⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☒ $50 ☐ $15 ☐ Other

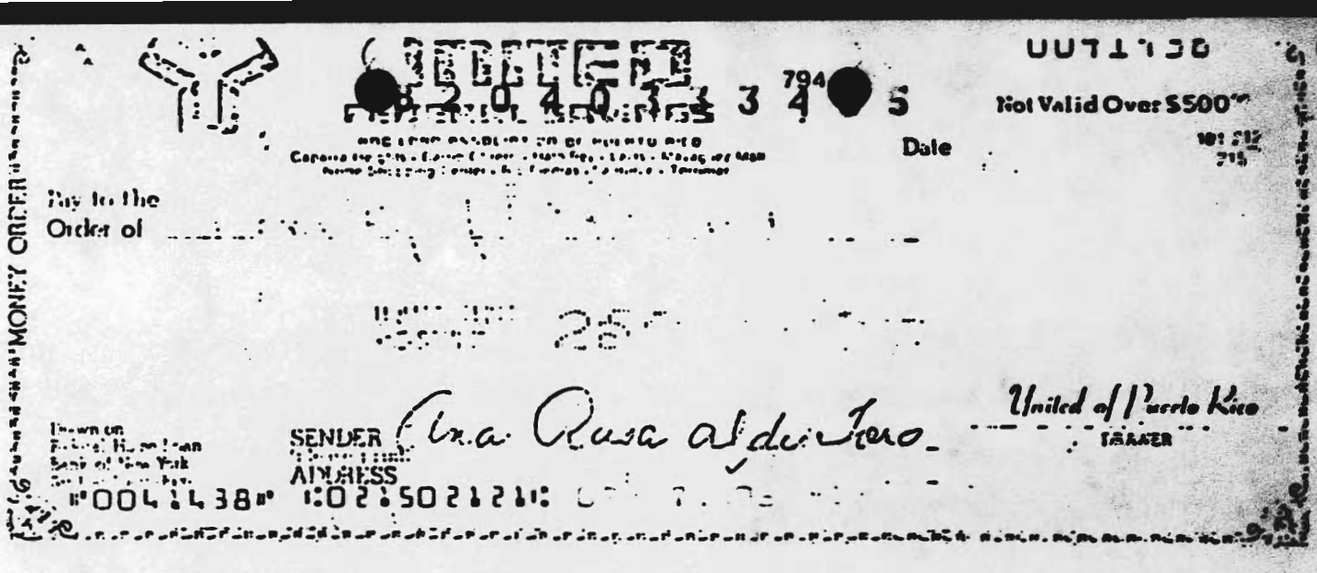
Name Antonio González Flores y/o Zulma González
Address Magnolia FF-11 Ext. Borinquen Gdns.
City & State Río Piedras, P.R. Zip Code 00926

Federal law requires us to request the following information
Occupation
Name of employer
Principal place of business

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Federal law prohibits corporate contributions



MONEY ORDER

UNITED
FEDERAL SAVINGS
AND LOAN ASSOCIATION OF PUERTO RICO
Caparra Heights · Santa Clara · Hato Rey · Lajas · Mayagüez Mall
Nona Shopping Center · Rio Piedras · Santurce · Torrimar

794-08-8

0041438

Not Valid Over $500.00

Date

181-212
215

Pay to the
Order of

Drawn on
Federal Home Loan
Bank of New York

SENDER
(please print)
Ana Rosa Alduino

ADDRESS

United of Puerto Rico
LEARER

⑈00414 38⑈ ⑆021502121⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name _____
Address Vista Alegre
City & State _____ Zip Code _____

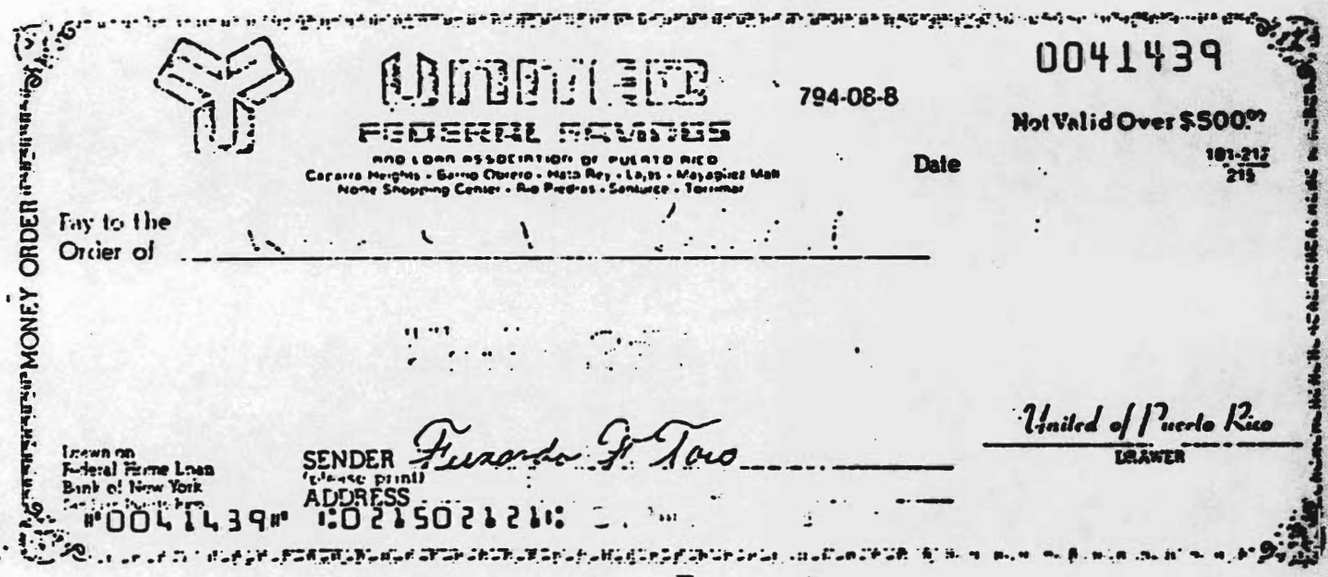
Federal law requires us to request the following information
Occupation _____
Name of employer _____
Principal place of business _____

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: _____

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.



MONEY ORDER

UNITED
FEDERAL SAVINGS
AND LOAN ASSOCIATION OF PUERTO RICO
Caparra Heights · Santa Clara · Hato Rey · Lajas · Mayagüez Mall
Nona Shopping Center · Rio Piedras · Santurce · Torrimar

794-08-8

0041439

Not Valid Over $500.00

Date

181-212
215

Pay to the
Order of

Drawn on
Federal Home Loan
Bank of New York

SENDER
(please print)
Fernando F. Toro

ADDRESS

United of Puerto Rico
LEARER

⑈00414 39⑈ ⑆021502121⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Fernando Toro
Address Imperial G-29 Vista Alegre
City & State Ponce, P.R. Zip Code 00731

Federal law requires us to request the following information
Occupation Retired
Name of employer —
Principal place of business —

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature Fernando F. Toro

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

MONEY ORDER

Not Valid Over $500.00

Pay to the Order of

Date

SENDER Gloria Morris Coll

ADDRESS

United of Puerto Rico

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☑ Other

Name GLORIA MORRIS COLL
Address 56 ARGENTINA GARDENVILLE
City & State GUAYNABO, P.R. Zip Code 00657

Federal law requires us to request the following information
Occupation Housewife
Name of employer
Principal place of business

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature Gloria Morris Coll

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington D C

---

LCDO. RAMON LLOVERAS OTERO
TE
APARTADO 895
SAN JUAN, P.R. 00902

No. 80-84

101-205
215

14 de marzo de 19 80

PAY TO THE ORDER OF Kennedy for President Committee $ 50.00

-----CINCUENTA con 00/100----------DOLLARS

Banco de San Juan
SAN JUAN, P. R.

IF INCORRECT PLEASE RETURN NO RECEIPT NECESSARY

---

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☑ Other

Name RAMON LLOVERAS
Address Garden Hills
City & State Guaynabo, P.R. Zip Code 00657

Federal law requires us to request the following information
Occupation LAWYER
Name of employer
Principal place of business APARTADO 895-SAN JUAN, P.R. 00902

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington DC

(31)

SAN JUAN, PUERTO RICO

⑆021503341⑈ 7

OFFICIAL CHECK

NO. 1-031-172845 Abril 10-80 $250.00

B.P.P.R. RIO PIEDRAS [illegible] 250 00/100 CTS

PAY

TO THE ORDER OF:

KENNEDY FOR PRESIDENT

TWO SIGNATURES REQUIRED

[signature]

PAY WITH A SIGNATURE

COUNTERSIGNATURE

⑈031172845⑈ [illegible]

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Sebastian Cruz & Associates

Address Edificio El Caribe

City & State San Juan, P.R. Zip Code 00901

Federal law requires us to request the following information

Occupation Insurance

Name of employer Sebastian Cruz & Associates

Principal place of business Edificio El Caribe, San Juan

This contribution is my own personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature [signature]

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

GENERAL ACCOUNT

NO. 35530

101 798
215

banco de ahorro del oeste

SUCURSAL PDC
MAYAGUEZ, PUERTO RICO

10 de marzo de 19 80

Pay

TO THE ORDER OF:

DOLLARS $ 250.00

TWO SIGNATURES REQUIRED

Kennedy for President

[signature]

[signature]

BS BANCO DE SANTANDER
PUERTO RICO
MAYAGUEZ, PUERTO RICO ⑆021502341⑈

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Miguel A. Pérez Comas

Address Apto. 3450

City & State Mayaguez, P.R. Zip Code 00708

Federal law requires us to request the following information

Occupation self employed - executive

Name of employer

Principal place of business

This contribution is my own personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature [signature]

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

(32)

6204038 80 101-234/215

Pay to the order of ---Comité Ted Kennedy P. R.---------- $ 100.00

Cien con----------00/100---Dollars

BANCO DE SANTANDER -PUERTO RICO
SUCURSAL DE SAN SEBASTIAN
SAN SEBASTIAN, PUERTO RICO

For Contribución

⑆021502341⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Miguel A. Deynes Soto
Address Box 245
City & State Moca, P.R. Zip Code 00716

Federal law requires us to request the following information
Occupation self employed
Name of employer
Principal place of business

This contribution is my own personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Reports are filed as required by the Federal Election Commission. A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

---

ULISES LABOY FERNANDEZ Y/O
LYDIA A. DE LABOY
1160 MAGDALENA AVE. APT. 2 A
CONDADO, P.R. 00907

679

19 101-209/215

PAY TO THE ORDER OF $

DOLLARS

BANCO DE PONCE
TANCA AND RECINTO SUR BRANCH
SAN JUAN, PUERTO RICO

FOR

⑆021502095⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☒ $50 ☐ $15 ☐ Other

Name Lydia E. de Laboy
Address 1160 Magdalena Ave. Apt. 2-A
City & State Condado, P.R. Zip Code 00907

Federal law requires us to request the following information
Occupation housewife
Name of employer
Principal place of business

This contribution is my own personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Reports are filed as required by the Federal Election Commission. A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

(33)

BAYAMON, P.R. 00619

⑆204033⑆43⑈1

101-204
215

PAY TO THE ORDER OF Kennedy for President $ 50.00

Cincuenta con 00/100 DOLLARS

THE CHASE MANHATTAN BANK

Ma. del Carmen Taboas

FOR ⑆021502066⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☒ $50 ☐ $15 ☐ Other

Name Ma. del Carmen Taboas
Address Calle 9-D-1 Victor Braeger
City & State Bayamon, P.R. Zip Code 00619

Federal law requires us to request the following information
Occupation self employed - lawyer
Name of employer
Principal place of business

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

0952

ABBY E. RODRIGUEZ
COND. PALMAS REAL 8-A
MIRAMAR, P.R. 00907

101-204
215

PAY TO THE ORDER OF $.120.00

DOLLARS

CITIBANK
Citibank, N.A. San Juan, P.R. 00901

FOR ⑆021502040⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Abby E. Rodríguez
Address Con. Palma Real 8-A
City & State Miramar, P.R. Zip Code 00907

Federal law requires us to request the following information
Occupation housewife
Name of employer
Principal place of business

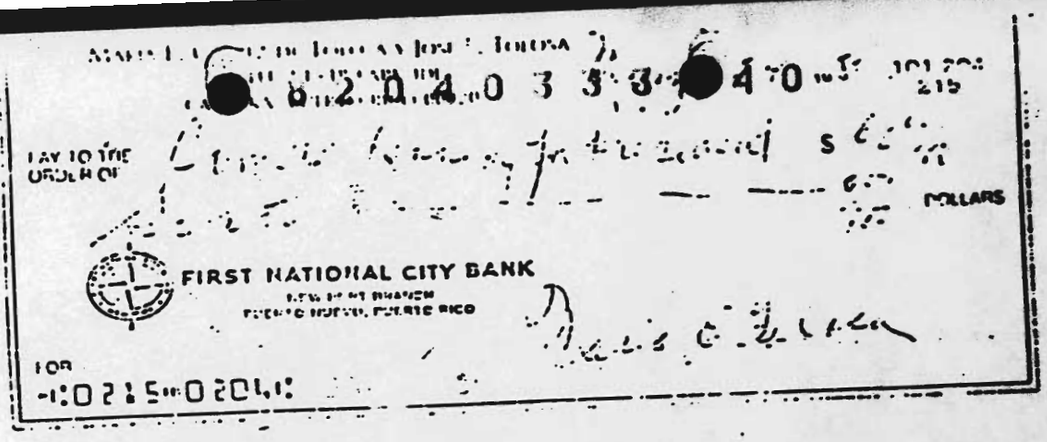
This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

(34)




KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

100.00

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☒ Other

Name María E. Gonzalez

Address Calle 2 B-16 Parkside 00920

City & State Caparra P.R. Zip Code

Federal law requires us to request the following information

Occupation housewife

Name of employer

Principal place of business

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account I understand that federal law prohibits corporate contributions

Signature María E. González

Paid for by the Kennedy for President Committee
Federal law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission Washington D C

3-10-80 Puerto Rico 35

Cash

⑆ 8 2 0 4 0 3 3 3 ⑆ 4 1 248570

FNCB RIO PIEDRAS FIVE HUNDRED AND 00 CTS

$ *500.00

PAY TO THE ORDER OF

Kennedy for President

AUTHORIZED SIGNATURE

⑈ 2⑉09⑉0248570⑈

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☒ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Hdo. Ramon Nuñez
Address Ochoa #41
City & State Cayey, P.R. Zip Code 00633

Federal law requires us to request the following information
Occupation
Name of employer
Principal place of business

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Hdo. Ramon Nuñez

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission Washington DC

4561

ENRIQUE VAZQUEZ, JR.
BOX 1470
PONCE, PUERTO RICO 00731

6 de marzo 1980 101-209/215

PAY TO THE ORDER OF Kennedy for President $250.00

Dos cientos cincuenta No/100 DOLLARS

BANCO DE PONCE
PONCE, PUERTO RICO 00731

MEMO

Enrique Vazquez Jr.

⑆021502095⑆ 4561

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name MR. ENRIQUE VAZQUEZ JR.
Address P.O. BOX 1470
City & State PONCE, P.R. Zip Code 00731

Federal law requires us to request the following information
Occupation EXECUTIVE INSURANCE Co.
Name of employer ENRIQUE VAZQUEZ, INC.
Principal place of business PONCE, Puerto Rico

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature. Enrique Vazquez Jr.

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission Washington DC

(36)

RAMON VEGA SOSA 1885

0 2 0 4 0 3 3 3 0 4 2

PAY TO THE ORDER OF Kennedy for President , 500 00

DOLLARS

BANCO POPULAR DE PUERTO RICO
PUERTA DE TIERRA BRANCH
SAN JUAN, PUERTO RICO

FOR

⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington D C 20037

Make Check payable to Kennedy for President Committee

☐ $1,000 ☒ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name RAMON VEGA
Address BOX 188
City & State HUMACAO, PR Zip Code 00661

Federal law requires us to request the following information:
Occupation BUSINESS
Name of employer SELF
Principal place of business P.R.

Signature

LCDO. PEDRO ZORRILA MARTINEZ 2022
CITIBANK TOWER PISO 20
AVE. PONCE DE LEON 252
HATO REY, P.R. 00917

PAY TO THE ORDER OF Kennedy for President $ 500

DOLLARS

BANCO CENTRAL Y ECONOMIAS

FOR

⑆021502723⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☒ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Pedro Zorrilla Martinez
Address Citibank Tower Piso 20
City & State Ave. Ponce de Leon 252 Zip Code 00917

Federal law requires us to request the following information
Occupation LAWYER
Name of employer SELF-Employed
Principal place of business

This contribution is made from personal funds, and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, DC

(37)

Girod Trust Company
San Juan, Puerto Rico

MANAGER'S CHECK

1608

DATE

PAY TO THE ORDER OF

$

DOLLARS

Authorized Signature

"001608" ⑆021502781⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☒ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Alberic Girod
Address Tetuan 355
City & State San Juan P.R.
Zip Code

Federal law requires us to report the following information
Occupation self employed - executive
Name of employer
Principal place of business

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions

Signature

Paid for by the Kennedy for President Committee
Filed with the proper corporate committee

A copy of our report is filed with and is available for purchase from the Federal Election Commission Washington, D C

320

GUIMERSINDO CARMONA RIVERA
COMERIO, P.R. 00642
BOX 82

May 2 19 52 101-201/215

Pay to the order of Kennedy for President $1,000.00

One thousand and 00/100 Dollars

BANCO POPULAR DE PUERTO RICO
COMERIO, PUERTO RICO

For

⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☒ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Guimersindo Carmona Rivera
Address Box 82
City & State Comerio PR. Zip Code 00692

Federal law requires us to report the following information
Occupation Hotel of Comerio
Name of employer
Principal place of business:

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions

Signature

Paid for by the Kennedy for President Committee
Filed with the proper committee for corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election

...ARRAGUERRI II M.D.
...TA O. DE IFARRAGUERRI
...EL ... AVE. ...
HATO REY, P.R. 00918

101-209
215

PAY TO THE ORDER OF ... $ ...

... DOLLARS

roig bank ROIG COMMERCIAL BANK
SANTURCE, PUERTO RICO

FOR ...

⑆021502668⑆ ...

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name ...
Address ... Hatillo
City & State ... Zip Code ...

Federal law requires us to request the following information
Occupation ...
Name of employer ...
Principal place of business ...

This contribution is my own personal contribution made with my personal funds and is not drawn on any corporate account I understand that federal law prohibits corporate contributions

Signature ...

Paid for by the Kennedy for President Committee
Federal law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission Washington D C

EDGARDO A. GONZALEZ Y/O
OLGA ALVAREZ DE GONZALEZ
SUITE 500 EDIF. FOMENTO
HATO REY, PUERTO RICO 00918

122

101-209
215

PAY TO THE ORDER OF ... $ ...

... DOLLARS

BANCO DE PONCE
SUCURSAL EL MONUMENTAL
EL MONUMENTAL PLAZA
RIO PIEDRAS, PUERTO RICO

FOR ...

⑆021502095⑆ ...

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N W
Washington, D C 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☒ $100 ☐ $50 ☐ $15 ☐ Other

Name ...
Address ...
City & State ... Zip Code ...

Federal law requires us to request the following information
Occupation ...
Name of employer ...
Principal place of business ...

This contribution is my own personal contribution made with my personal funds and is not drawn on any corporate account I understand that federal law prohibits corporate contributions

Signature ...

Paid for by the Kennedy for President Committee
Federal law prohibits corporate contributions

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040183

58-12-1

MARCH 12 1980 $ 3,000.00

PAY TO THE ORDER OF DAVID SAWYER

B. P. P. R. POP. TAX CERTIF. 3000 DOLS 00 CTS DOLLARS

TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040183⑈ ⑆0260-0888⑆

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040186

58-12-1

MARCH 12 1980 $ 2,000.00

PAY TO THE ORDER OF DAVID SAWYER

B. P. P. R. POP. TAX CERTIF. 2000 DOLS 00 CTS DOLLARS

TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040186⑈ ⑆0260-0888⑆

8 2 0 4 0 3 3 4 4 3

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040184

53-12-1

MARCH 19,1930. $**3,000.00**

PAY TO THE ORDER OF DAVID SAWYER

B. P. P. R. 3000 DOLS 00 CTS

POPULAR CODE

DOLLARS

OVER $500 OF TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040184⑈ ⑆0260-0881⑆

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040185

58-12-1

MARCH 19,1930. $**3,000.00**

PAY TO THE ORDER OF DAVID SAWYER

B. P. P. R. 3000 DOLS 00 CTS

POPULAR CODE

DOLLARS

OVER $500 OF TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040185⑈ ⑆0260-0881⑆ 90-9000 3-0⑈

20403346

20403347

SWORN STATEMENT

I, Julio Héctor Morales, of legal age, married, Administrative Officer of an advertising agency and resident of San Juan, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above mentioned.

2. That I am employed in Lopito, Ileana & Howie, an advertising agency, doing business in San Juan, Puerto Rico.

3. That this agency performed part of the advertising for the Kennedy campaign in Puerto Rico.

4. That we received $168,962.33 of which $88,230.33 were paid in cash for the Kennedy Campaign media expenses.

5. That the Kennedy Campaign in Puerto Rico has completed their debts with our agency.

In San Juan, Puerto Rico, 17 of April, 1980.

Julio Héctor Morales

AFFIDDAVIT NO. 2121

Suscribed and sworn to before me by Julio Héctor Morales of the personal circumstances above mentioned.

In San Juan, Puerto Rico, 17 of April, 1980.

LUIS FRANCISCO HERNANDEZ VELEZ

Notary Public

SWORN STATEMENT

I, MIGUEL A. RIVERA, of legal age, lawyer, married and a resident of Guaynabo, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above-mentioned.

2. That during the month of March, 1980 the Kennedy For President Committee organized various fund raising activities.

3. That one of these activities was an island-wide radio marathon. Radio marathons are a customary method of raising funds for political candidates in Puerto Rico. Usually, starting sometime prior to the marathon, various campaign workers will solicit contributions from individuals throughout Puerto Rico. On the day of the marathon all these contributions are brought to a central location. Further on the date of the marathon, contributions are solicited from individuals on the streets.

4. That the amount collected during the island-wide radio marathon for Kennedy for President Committee was $99,230.33 in cash and checks payable in cash for small amounts from individuals.

5. That no contributions in cash was received from any individual that was in excess of $50.00 or in cash checks.

6. That out of the amount raised from the radio marathon, $88,230.33 was paid in cash to Ileana, Lopito and Howie, an advertising agency, for radio and television commercials. Further, $11,000.00 was paid by money order to David Sawyer for film production cost.

7. That the Puerto Rico Kennedy For President Committee had an agreement with the National Committee that funds raised locally would, whenever possible, be returned for the use of the local campaign.

8. That during the final days prior to the Presidential Primary in Puerto Rico, there was not sufficient time to send the locally collected contributions to the National Headquarters in Washington and receive the return of those funds. Further, Ileana, Lopito and Howie and David Sawyer required the Kennedy

(13)



For President-Puerto Rico Committee to make deposits and/or pay in advance for all media cost.

9. That in order to have the services of Ileana, Lopito and Howie and David Sawyer, prior to the Presidential Primary in Puerto Rico, it was necessary to make deposits and/or pay in advance for media cost.

In San Juan, Puerto Rico, this 25th day of November, 1980.

Miguel A. Rivera

Affidavit No. 388

Sworn and subscribed to before me by Miguel A. Rivera, of the personal circumstances above stated, to me personally known this 25th day of November, 1980 at San Juan, Puerto Rico,

ABOGADO NOTARIO

NOTARY PUBLIC

(49)

HAND DELIVERED

# Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of $1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with only that one election's campaign are subject to each election.

1(a) Name of Committee (in full) ☐ Check if name or address is changed

Kennedy for President Committee

(b) Address (number and street)

1250-22nd Street, N.W.

(c) City, State and ZIP code

Washington, D.C. 20037

2 Identification Number

C00115022

3 Date

February 26, 1980

4 Is this an amended statement ☒ Y
If "YES" FILL IN ONLY THOSE I
WHICH THERE HAS BEEN A CHA

5 Check one:

☐ (a) This committee has been designated as the principal campaign committee for ___ (Name of Candidate)

a candidate for ___ (Federal office sought) in the ___ (Year of election) Electi

to be held in the State of ___ (State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT O
EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) This committee is supporting only one candidate, and is authorized by ___ (Name of Candidate)

to receive contributions and make expenditures with respect to the ___ (General, Primary, Runoff, etc)

held in ___ (Year of election in State), and will file all reports and statements with the candid.

committee, ___ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (FEC FORM 2a)

☒ (c) This committee supports only one candidate ___ (Name of Candidate) but is not an authorized comm

☐ (d) This committee supports more than one Federal candidate and is not a party committee.

☐ (e) This committee is a ___ (National, State, county, city) committee of the ___ (Democratic, Republican, etc.) Party.

| 6 Names of affiliated and/or connected organizations | Mailing address and ZIP code |
|---|---|
| | |

Attachment II

If the committee's political committee has identified a "connected organization" above, please indicate type of organization:

☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association

☐ Corporation without capital stock ☐ Other (please specify)

C00115125

Bank of New Hampshire
Concord, NH

Metro National Bank
P.O. Box 5524
Denver, CO 80217

Connecitcut Bank & Trust
One Constitution Plaza
Hartford, CT. 06115

Franklin State Bank
6030 Franklin Blvd.
Somerset, NJ 08873

Provident National Bank & Trust Co.
Broad & Chestnut Street
Philadelphia, PA

Virginia National Bank
Norfolk, Va.

Seattle Trust & Savings Bank
119 First Avenue, South
Seattle, Washington 98109

First Wisconsin National Bank of Milwaukee
N. Water Street
Milwaukee, Wisc.

Banco De Santauder
Sucurbal Ave., Morez Rivera
Hato Rey, Puerto Rico

C20403345I



A copy of our report is filed with the Federal Election Commission
and is available for purchase from the Federal Election Commission, Washington, D.C.

[redacted]

Enclosure

Attachment III

BADERPR 3450062
JUN 20 AST1107

BADERPR 3450062

REFERENTE SU PEDIDO SO BRE CABLE
JPA447 VIA ITT QI B281 4-032559*170
PDSJ CO UIAX 071
TDMT WASHINGTONDC 71/66 18 1234P EST
BANCO DE SANTANDER
ETC ETC.
USTEDES PIDIERON NOMBRE DEL REMITENTE AQUI LO TIENEN

SENDERS NAME AND ADDRESS

KENNEDY FOR PRESIDENT COMMITTEE
ATTN M HILL
1250 22 S T////ST NORTHWEST
WASHINGTON DC 20037

REPITO
KENNEDY FOR PRESIDENT COMMITTEE
ATTN M HILL
1250 22 ST NORTHWEST
WASHINGTON DC 20037

BADERPR 3450062

820403345

World Communications via ITT

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

**Subpoena Duces Tecum to Produce Certain Documents**

TO: Mr. Ruben Rivera Collado, Manager
Banco de Santander-Puerto Rico, San Juan Branch
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

As the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(3), the Banco de Santander-Puerto Rico, San Juan Branch is hereby ordered to produce for inspection and copying the documents listed below. Production is to be made within fifteen (15) days of your receipt the Commission's certification that the requirements of the Financial Privacy Act of 1978 have been complied with by the agency, by sending the documents designated herein by certified mail, to the Office of General Counsel, Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463, Attention: Marsha Gentner.

1. Copies of all bank statements covering the period from January 18, 1980 to the present for customer account number ... (Kennedy for President Committee/Puerto Rico, Miguel Lausell, signator).

2. Copies of deposit slips and all other documents and materials (including, but not limited to letters, memoranda, transfer slips, money orders and checks made payable to the drawer of the account or to cash, and any other written notations) relating to any deposit or transfer of funds into account number 008-03511 for the period from January 18, 1980 through the present.

8204033454

3. Copies of the front and back of all cancelled checks, drawn on account number 008-0351 from the period of January 18, 1980 to present.

WHEREAS, the Chairman of the Federal Election Commission has hereunto set his hand at the Office of the Commission, 1325 K Street, N.W., Washington, D.C. 20463, this day of , 1981.

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

8204033455

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

# AUTHORIZATION TO ISSUE SUBPOENA DUCES TECUM

The Commission hereby authorizes a Subpoena Duces Tecum to be issued to:

Banco de Santander - Puerto Rico, San Juan Branch
Ruben Rivera Collado, Manager
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

| | |
|---|---|
| John Warren McGarry<br>Chairman | Thomas E. Harris<br>Commissioner |
| Frank P. Reiche<br>Vice Chairman | Robert O. Tiernan<br>Commissioner |
| Joan D. Aikens<br>Commissioner | Vernon W. Thomson<br>Commissioner |

6204033334556

(50)

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

# RIGHT TO FINANCIAL PRIVACY ACT NOTICE

TO: William C. Oldaker, Treasurer
Kennedy for President Committee

Records or information concerning Kennedy for President Committee ("the Committee") transactions held by the financial institution named in the attached subpoena are being sought by this agency in accordance with the Right to Financial Privacy Act of 1978 for the following purpose:

> Investigation of alleged violations of 2 U.S.C. §§ 432(h)(1), 433(b)(6) and (c), 434(b)(2)(A), (b)(3)(A), and (b)(4)(A) by the Committee in connection with the failure to timely report certain Committee expenditures and receipts, and the failure to deposit receipts into and make expenditures from a registered Committee depository. See General Counsel's Legal and Factual Analysis ( , 1981) in MUR .

If the Committee desires, that such records or information not be made available, you must:

1. Fill out the accompanying motion paper and sworn statement or write one of your own stating that the Committee is the customer whose records are being requested by the Government and either giving the reasons you believe that the records are not relevant to the legitimate law enforcement inquiry stated in this notice and/or any other legal basis for objecting to the release of the records.

2. File the motion and statement by mailing or delivering them to the clerk of any one of the following United States district courts: United States District Court for the District of Columbia, United States District Court for the District of Puerto Rico.

3. Serve the Government authority requesting the records by mailing or delivering a copy of your motion and statement to Charles N. Steele, General Counsel, 1325 K Street, N.W., Washington, D.C. 20463.

Attachment IV

0204033457

4. Be prepared to come to court and present the Committee's position in further detail.

5. The Committee does not need to have a lawyer, although you may wish to employ one to represent the Committee and protect its rights.

If the above procedures are not followed by someone acting on behalf of the Committee upon the expiration of ten days from the date of service or fourteen days from the date of mailing of this notice, the records or information requested therein will be made available. These records may be transferred to other Government authorities for legitimate law enforcement inquiries, in which event the Committee will be notified after the transfer.

6204033458

_____
Date

_____
Charles N. Steele
General Counsel
Federal Election Commission

(52)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

KENNEDY FOR PRESIDENT COMMITTEE )
)
Petitioner, )
)
)
v. )
)
)
FEDERAL ELECTION COMMISSION )
)
Respondent )

8204033459

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

, on behalf of petitioner Kennedy for President Committee, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by respondent Federal Election Commission and, in support thereof, deposes and says as follows:

1. Kennedy for President Committee (hereinafter "the Committee") is a customer of the Banco de Santander Puerto

(53)

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, petitioner moves the court to enter an order quashing the attached subpoena.

[Treasurer/Chairman/Counsel for]
Kennedy for President Committee

52040333460

8204033361

(52)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF

KENNEDY FOR PRESIDENT COMMITTEE )
)
Petitioner, )
)
)
v. )
)
)
FEDERAL ELECTION COMMISSION )
)
Respondent )

20403345 9

MOTION TO QUASH ADMINISTRATIVE SUBPOENA FOR BANK RECORDS UNDER RIGHT TO FINANCIAL PRIVACY ACT OF 1978

, on behalf of petitioner Kennedy for President Committee, being duly sworn according to law, hereby petitions this court to quash the attached subpoena issued by respondent Federal Election Commission and, in support thereof, deposes and says as follows:

1. Kennedy for President Committee (hereinafter "the Committee") is a customer of the Banco de Santander Puerto Rico from which defendant seeks to obtain records by means of an administrative subpoena, a copy of which is attached hereto as Exhibit A.

2. The records described in the subpoena pertain to the Committee's transactions as a customer of said bank.

3. This court has jurisdiction pursuant to 28 U.S.C. § 1331(a), the federal question being the extent of my rights under 12 U.S.C. §§ 3401-3422 to prevent government access to my bank records.

4. The financial records sought by the subpoena are not relevant to the legitimate law enforcement inquiry stated in the Commission's Right to Financial Privacy Act Notice (a copy of which is attached hereto as Exhibit B) for the following reasons:

[state whatever reasons you may have]

(53)

5. There has not been substantial compliance with the Right to Financial Privacy Act of 1978 for the following reasons:

[state whatever reasons you may have]

6. [State any other legal bases on which you object to the release of your records]

WHEREFORE, petitioner moves the court to enter an order quashing the attached subpoena.

[Treasurer/Chairman/Counsel for]
Kennedy for President Committee

8 2 0 4 0 3 3 3 4 6 0

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

# CERTIFICATION OF COMPLIANCE WITH THE RIGHT TO FINANCIAL PRIVACY ACT

TO: Banco de Santander - Puerto Rico
Calle Recinto Sur 251
San Juan, Puerto Rico 00936

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

RE: MUR

I hereby certify, pursuant to Section 1103(b) of the Right to Financial Privacy Act of 1978, 12 U.S.C. § 3403(b), that the provisions of the Act have been complied with as to the enclosed Subpoena Duces Tecum To Produce Certain Documents and Materials which is being issued pursuant to 2 U.S.C. § 437d(a)(3). I further certify that good faith reliance upon this certificate relieves your institution and its employees and agents of any possible liability to the customer in connection with the disclosure of this information.

Date

Charles N. Steele
General Counsel

8204033463

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Oldaker, Esquire
Treasurer, Kennedy for President
Committee
1050 17th Street, N.W.
Washington, D.C. 20036

RE: Matter Under Review (MUR)

Dear Mr. Oldaker:

Enclosed is a subpoena to produce certain documents and materials and order to answer written questions issued by the Federal Election Commission ("Commission") to the Kennedy for President Committee.

The subpoena requires that production of specified documents be made at the time and place stated therein and that responses to the interrogatories be propounded to the Commission within ten (10) days of your receipt of the enclosed order.

If you have any questions, please contact staff attorney Ms. Marsha Gentner at (202) 523-5071.

Sincerely,

Charles N. Steele
General Counsel

Enclosures: Subpoena

cc: Kennedy for President Committee
P.O. Box 3743
Washington, D.C. 20007

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(56)

UNITED STATES OF AMERICA
FEDERAL ELECTION COMMISSION

SUBPOENA TO PRODUCE DOCUMENTS AND MATERIALS
AND ORDER TO ANSWER WRITTEN QUESTIONS

TO: Kennedy for President Committee
P. O. Box 3743
Washington, D.C. 20007

RE: MUR

At the instance of the Federal Election Commission, pursuant to 2 U.S.C. § 437d(a)(1) and (3), the Kennedy for President Committee is hereby ordered to produce for inspection and copying all documents and materials listed below that are in the possession or control of the Kennedy for President Committee, the Kennedy for President Committee/ Puerto Rico, or of any of the officers, agents, staff members, volunteers or employees of these two committees. Production is to be made at the Office of General Counsel of the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. , on , at 10:00 a.m. In addition, the Kennedy for President Committee is hereby ordered to submit responses in writing and under oath to the interrogatories propounded herein, to the Federal Election Commission within ten (10) days of its receipt of this order.

Please produce the following in their entirety:

1. All monthly reports of expenditures supplied by the Kennedy for President Committee/Puerto Rico local field

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office to the treasurer or any other officer, staff member, employee, or volunteer of the Kennedy for President Committee. See Letter from William C. Oldaker to Charles N. Steele, dated December 2, 1980, at 2, ¶ 2 (hereinafter "Committee Letter").

2. All documents and materials (including but not limited to receipts, invoices, cancelled checks, monthly billing statements) relating to the payment by the Kennedy for President Committee/Puerto Rico of the following expenditures ( See 2 U.S.C. § 432(c)(5)):

a. $88,230.33 in cash to Ileana, Lopita and Howie

b. $11,000 on March 19, 1980, to David Sawyer

3(a) All records and accounts (including but not limited to cancelled checks and money orders, receipts, contributor cards, ledgers, lists, index cards, microfilm, and computer print-outs) of contributions received as a result of, or in connection with, the radio "marathon" held by the Kennedy for President Committee/Puerto Rico prior to the March 16, 1980, Democratic Presidential Primary in Puerto Rico (Committee Letter at 3-4). See 2 U.S.C. § 432(c)(1), (2) and (3).

(b) All such records and accounts of any contributions received which comprised any portion of the following deposits made into Kennedy for President Committee account Banco de Santander - Puerto Rico, San Juan, Puerto Rico ( See Committee Letter at 2-3, and Affidavit of Miguel D. Lausell, attached thereto):

9204033346

| DEPOSIT DATE | AMOUNT |
|---|---|
| February 1980 | $4,000.00 |
| February 1980 | 2,000.00 |
| March 1980 | 20.00 |
| April 11, 1980 | 6,325.00 |
| June 13, 1980 | 365.00 |

If any document requested herein is withheld under a claim of privilege or objection, please furnish a list identifying each such document for which the privilege or objection is claimed, along with the following information:

(a) a description of the subject matter;
(b) the date of the document;
(c) the name and title of the author;
(d) the name and title of the person to whom the document was addressed;
(e) the name and title of the person to whom the document was actually sent;
(f) the identity of any other person who read all or part of the document;
(g) the number of pages;
(h) the paragraph of this subpoena to which the document is otherwise responsive, and
(i) the nature of the claimed privilege or objection.

Please answer the following interrogatories:

A. Provide the date of the amended statement of organization filed with the Commission on which the Kennedy for President Committee disclosed the following depository as a Committee depository:

Banco de Santander-Puerto Rico
G.T.O. Box 2589
San Juan, Puerto Rico.

B. Provide the day of the month on which each of the deposits listed in document request no. 3(b), above, was made (unless otherwise designated in that list).

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(59)

C(1) Identify (by providing the account number, bank name and address, and name under which the account is held) each savings, checking or escrow account into which any funds received as a result of, or in connection with the radio marathon described in document request no. 3(a), above, were deposited, along with the date and amount of each such deposit.

(2) If any such funds referred to in part (1) of this interrogatory were not deposited into a checking, savings, or escrow account, please so state, supplying the amount of such funds, the name of each person in whose possession such funds were held, and whether such funds consisted of cash, money orders, checks, or drafts of any other type. See U.C.C. § 3-104.

D(1) Please provide the name and address of each person who made a contribution as a result of, or in connection with the radio marathon described in document request no. 3(a), above, along with the date and amount of each such contribution.

(2) If the information requested in part (1) of this interrogatory has been disclosed by the Kennedy for President Committee in a report filed with the Federal Election Commission, please also provide the date of each such report and the page on which the information in question appears.

E. Please provide the same information requested in Interrogatories (D)(1) and (2), above, for each contribution which comprised any portion of the deposits listed in document request no. 3(b), above.

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F(1) Please provide the date (day, month, and year) on which the following Kennedy for President Committee/Puerto Rico expenditures were made:

(i) $88,223.33 in cash to Ileana, Lopita and Howie

(ii) $11,000 to David Sawyer.

(2) If the expenditures listed in part (1) of this interrogatory were disclosed on reports filed by the Kennedy for President Committee with the Federal Election Commission, please provide the date of each such report and the page on which the information in question appears. See 2 U.S.C. §§ 434(b)(4)(A) and 434(b)(5)(A).

G(1) Please provide the name(s) and address(es) of the person(s), bank(s), institution(s), or other entity from whom the cash referred to in Interrogatory F(1)(i), above, was obtained.

(2) If any portion of the funds referred to in part (1) of this interrogatory were originally obtained by the Kennedy for President Committee/Puerto Rico by means other than cash, please provide the name, address and position held with the Kennedy for President Committee of each person who converted such funds into cash, along with the name and address of the bank, institution, or other entity where such conversion into cash was made.

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WHEREFORE, the of the Federal Election Commission has hereunto set his hand at the office of the Commission at 1325 K Street, N.W., Washington, D.C., this day of 1981.

ATTEST:

Marjorie E. Emmons
Secretary to the Commission

0204033334470

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

**AUTHORIZATION TO ISSUE SUBPOENA TO PRODUCE DOCUMENTS AND ORDER TO ANSWER WRITTEN QUESTIONS**

The Commission hereby authorizes a Subpoena To Produce Documents and Written Questions to be issued to:

Kennedy for President Committee
Box 3743
Washington, D.C. 20007

8204033471

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thomson
Commissioner

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Dear Mr. [redacted]

On [redacted] determined that [redacted] for President [redacted] (1), 433([redacted]) [redacted] of the [redacted] ["the Act"][redacted] [redacted] which [redacted] assembled for [redacted]

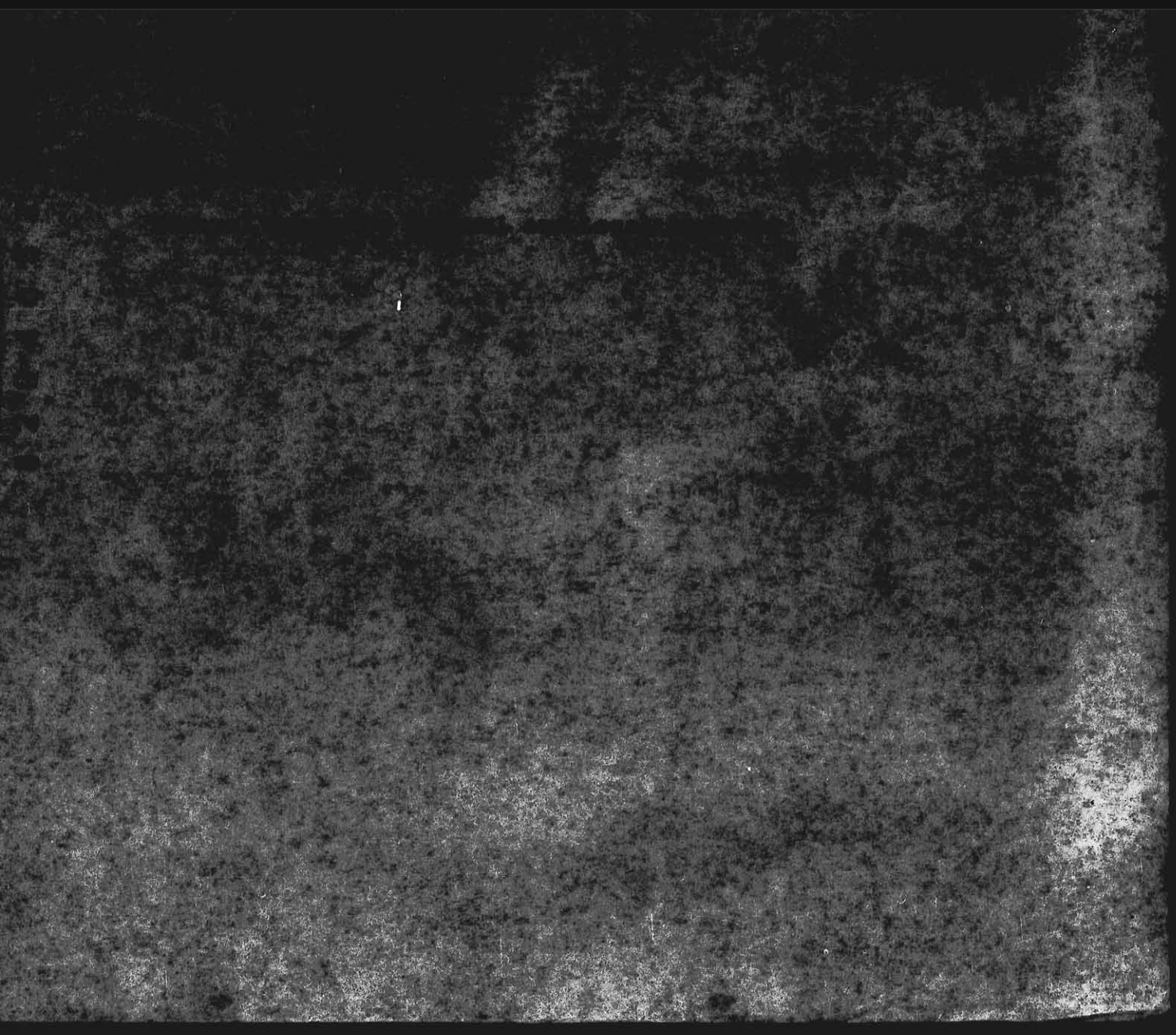
We have [redacted] this matter in all [redacted]

[redacted] no opinion [redacted] any [redacted] to the Committee [redacted] should be [redacted] latter. Where [redacted] under oath.

In the absence [redacted] stipulations] indicating the [redacted] strates that no [redacted] Committee, the Commission [redacted] that a violation [redacted] and [redacted] ciliation. Of course, [redacted] of this matter should [redacted] finding of probable [redacted] desires.

Attachment VII

8204077.42



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

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE: _____

MUR NO: _____
STAFF MEMBER(S) & TEL. NO.
Marsha Gentner
(202) 523-5071

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

8204033474

SUMMARY OF ALLEGATIONS

This matter stems from a letter from the Kennedy for President Committee, acknowledging that its Puerto Rico authorized committee violated certain provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"), by failing to timely report certain contributions received and expenditures made, as well as the addition of a Committee depository in Puerto Rico.

FACTUAL AND LEGAL ANALYSIS

BACKGROUND

On December 3, 1980, the Commission received a letter from William C. Oldaker, counsel for the Kennedy for President Committee ("KFP" or "the Committee") concerning certain violations of the Act by the KFP Puerto Rico authorized affiliate that came to the attention of the Committee. Specifically, the letter noted that a Puerto Rican depository of KFP had not been timely registered with the Commission as required by the Act, that five deposits made into this Puerto Rican depository were not reported by the Committee in FEC disclosure reports, that two Committee expenditures in Puerto Rico were made by means other than a check from a registered depository, and that these latter two expenditures were not timely reported by the Committee. In addition, the letter acknowledges that KFP funds were raised in Puerto Rico by means of a radio "marathon", but that these funds received were not placed in a KFP registered depository as required by the Act, and that the contributions comprising them were not timely reported.

In keeping with the usual Commission practice, this matter was designated as a Pre-MUR, on December 4, 1980.

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FACTUAL AND LEGAL ANALYSIS

A. KFP Puerto Rican Bank Account

Mr. Oldaker's letter on behalf of KFP indicates that a Committee bank account was opened on January 18, 1980 at the Banco de Santander (#008-3511), G.T.O. Box 2589, San Juan, Puerto Rico, but was not timely registered with the Commission as a Committee depository. 2 U.S.C. § 433(b)(6) requires a political committee to file a statement of organization with the Commission listing all depositories of the Committee. 2 U.S.C. § 433(c) further provides that any change in the information already submitted in a statement of organization shall be reported within ten days after the date of the change. See also 11 C.F.R. §§ 102.2(a)(1)(vi) and (2) and 103.1. No such amended statement of organization designating Banco de Santander as a Committee depository was filed from January 18, 1980 (the date the KFP account was opened at that depository) to January 28, 1980. 1/ Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 433(b)(6) and (c) and 11 C.F.R. §§ 102.2(a)(1)(vi) and (2) and 103.1 by failing to timely report the Committee Puerto Rican depository to the Commission.

Mr. Oldaker's letter also acknowledges that five deposits of Committee raised funds, in the amounts and on the dates listed below, were made into the KFP Banco de Santander depository, but were not reported to the Commission. These deposits were:

| DATE | AMOUNT |
|---|---|
| February, 1980 | $4,000.00 |
| February, 1980 | $2,000.00 |
| March, 1980 | 20.00 |
| April 11, 1980 | $6,325.00 |
| June 13, 1980 | 365.00 |

1/ The Committee did file an amended Statement of Organization on February 26, 1980, listing as a depository "Banco De Santauder, Sucurbal Ave., Morez Rivera, Hato Rey, Puerto Rico. This may be the same depository as that referred to above, although the address is not the same as that listed in the Oldaker letter, or as that listed for the Banco de Santander in Hato Rey. However, even if this is the same depository as the one in question, the statement of organization listing this depository was filed on February 26, 1980, well after the 10 day period set forth in 2 U.S.C. § 433(c).

2 U.S.C. § 434(b)(2)(A) requires each political committee to file periodic reports disclosing the total amount of committee receipts in contributions from persons, for the reporting period and for the calendar year. See also 11 C.F.R. § 104.3(a)(3)(i). As the letter from Mr. Oldaker on behalf of KFP admits that the contributions comprising the five deposits listed above were not disclosed in Committee reports filed with the Commission, the Office of General Counsel recommends that the Commission find there is reason to believe that KFP violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i). 2/

In addition, documents submitted on behalf of the Committee (attached to Mr. Oldaker's letter) show that some of the contributions comprising the April 11, 1980 deposit into the account at Banco de Santander were in excess of $200. As the letter submitted on behalf of the Committee acknowledges that these contributions were not reported by KFP to the Commission, the Office of General Counsel recommends that the Commission find there is reason to believe the Committee also violated 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3(a)(4) (i) by failing to designate in reports filed with the Commission, the identity (full name, mailing address, occupation, and name of employer, 11 C.F.R. § 100.12) of each person that made a contribution in excess of $200 to the Committee.

B. KFP Puerto Rico Fundraising Event

Some time before the March 16, 1980, Puerto Rican Democratic primary, KFP/Puerto Rico held a radio "marathon". This Committee fundrasing event is described as a day long radio program featuring political and entertainment celebrities in an effort to obtain pledges and contributions for the campaign. During, as well as prior to the radio marathon, contributions were received by KFP/Puerto Rico at various predetermined locations, including Puerto Rican street corners. According to the letter submitted on behalf of the Committee, this marathon raised $99,233.33.

2 U.S.C. § 432(h)(1) provides that all receipts of a political committee must be deposited into an account at a designated campaign depository. See also, 11 C.F.R. § 103.3(a) (such deposit must be made within ten days of the committee's receipt of the funds). As acknowledged by the Committee, KFP/Puerto Rico did not deposit the $99,233.33 received from the radio marathon into a Committee account at a designated depository. Accordingly, the Office of General Counsel recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a).

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2/ Banco Popular de Puerto Rico was not designated as a KFP campaign depository on reports filed by the Committee with the Commission.

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The letter from Mr. Oldaker on behalf of the Committee also acknowledges that the contributions comprising the $99,233.33 received from the radio marathon were not timely reported by the Committee. As previously noted, this information is required to be reported by the provisions in 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i). Therefore, the Office of General Counsel recommends that the Commission find there is reason to believe KFP also violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(i) by failing to timely report the total amount of Committe receipts in contributions from persons for the reporting period during which the KFP/Puerto Rico radio marathon was held.

Finally, the letter submitted on behalf of KFP states that the money received from the radio marathon was paid to two vendors of the Committee. KFP/Puerto Rico made a payment of $88,230.33, in cash, to the advertising firm of Ileana, Lopita and Howie of Puerto Rico. This payment was apparently made to cover the cost of Committee radio and television commericals. In addition, a total payment of $11,000, in the form of bank checks issued by Banco Popular de Puerto Rico 2/, was made by KFP/Puerto Rico on March 19, 1980, to David Sawyer of David Sawyer, Inc., apparently for production costs in connection with Committee commercials. (Copies of these bank checks were included as exhibits to Mr. Oldaker's letter.)

The Committee has acknoweledged that it did not timely report these two expenditures to Ileana, Lopita and Howie and David Sawyer, Inc., respectively, as is required by the Act and the regulations. Thus, the Office of General Counsel recommends that the Commission find there is reason to believe that KFP violated 2 U.S.C. § 434(b)(4)(A) and 11 C.F.R. § 104.3(b)(2)(i) for failing to report Committee disbursements made during the March 1980, reporting period. In that these two Committee expenditures were both in excess of $200, the Office of General Counsel also recommends that the Commission find there is reason to believe KFP violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) for failing to timely report the name and address of the persons to whom these expenditures were made, as well as the date, amount, and purpose of each of the two expenditures. Furthermore, as 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) require all political committee disbursements 3/ to be made by

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2/ Banco Popular de Puerto Rico was not designated as a KFP campaign depository on reports filed by the Committee with the Commission.

3/ Exempted from the provisions of 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) are petty cash expenditures of less than $100. See 2 U.S.C. § 432(h)(2).

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check drawn on an account in a registered campaign depository, and as KFP did not make the two expenditures in question by such method, the Office of General recommends that the Commission find there is reason to believe KFP violated these statutory and regulatory provisions, as well.

RECOMMENDATIONS

1. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 433(b)(6) and (c), and 11 C.F.R. §§ 102.2(a)(1)(vi) and (2), and 103.1 by failing to timely report the Committee's Puerto Rican depository, Banco de Santander.

2. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 434(b)(2)(A) and 11 C.F.R. § 104.3(a)(3)(i) by failing to report the contributions received by the Committee which comprised five deposits made in February, March, April and June, 1980, into the account at Banco de Santander, and by failing to timely report contributions received from the Committee Puerto Rico radio marathon.

3. Find reason to believe that the Kennedy for President Committee violated 2 U.S.C. § 434(b)(3)(A) and 11 C.F.R. § 104.3 (a)(4)(i) by failing to designate in reports filed with the Commission, the identity of those persons whose contributions of $200 or more, each, comprised a portion of the five unreported deposits into the Committee account at Banco de Santander in February through June of 1980.

4. Find reason to believe Kennedy for President Committee violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. § 103.3(a) by failing to deposit receipts obtained from its radio marathon into an account at a registered campaign depository within ten days of such receipt.

5. Find reason to believe the Kennedy for President Committee violated 2 U.S.C. § 434(b)(4)(A) and 11 C.F.R. § 104.3 (b)(2)(i) by failing to timely report its expenditures of $88,230.33 to Ileana, Lopita and Howie, and $11,000 to David Sawyer, Inc.; and reason to believe that the Committee violated 2 U.S.C. § 434(b)(5)(A) and 11 C.F.R. § 104.3(b)(4)(i) by failing to timely report the name and address of the persons to whom these expenditures were made, as well as the date, amount, and purpose of each such expenditure.

6. Find reason to believe the Kennedy for President Committee violated 2 U.S.C. § 432(h)(1) and 11 C.F.R. §§ 102.10 and 103.3(a) by failing to make its expenditures of $88,230.33 and $11,000 to Ileana, Lopita and Howie, and David Sawyer, Inc., respectively, by check drawn on an account at a registered Committee depository.

6204033478

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER

DATE: APRIL 1, 1981

SUBJECT: MUR 1370 Interim Investigative Report #1, dated 3-27-81; Received in OCS, 3-30-81, 2:55

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 11:00, March 31, 1981.

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

8204033479

BEFORE THE FEDERAL ELECTION COMMISSION
March 27, 1981

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of )
) MUR 1370
Kennedy for President Committee )

81 MAR 30 P 2: 55

INTERIM INVESTIGATIVE REPORT #1

On February 23, 1981, the Commission found reason to believe the Kennedy for President Committee ("Committee") violated 2 U.S.C. §§ 432(h)(1), 433(b)(6) and (c), 434(b)(2)(A), (b)(3)(A), (b)(4)(A), and (b)(5)(A), in connection with the activities of its Puerto Rican affiliate Committee. A letter of notification along with a Commission approved subpoena duces tecum and interrogatories were sent to the respondent. A subpoena duces tecum was also served on the manager of the bank in Puerto Rico which contained a Committee account.

The Committee made a timely submission of its responses to the Commission's interrogatories. In addition, documents are to be produced by the Committee, pursuant to the Commission's subpoena, on March 27, 1981. Document production on behalf of the bank is scheduled to take place approximately two weeks thereafter.

The Office of General Counsel is in the process of reviewing the information submitted by the Committee, and will continue to review the subpoenaed materials as they are produced. When that review process is completed, the OGC will either forward a request to the Commission for authorization of additional investigative actions, or will proceed to the briefing stage of the compliance process in this matter.

27 March 1981
Date

Charles N. Steele
General Counsel

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MUR 1970

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 22, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. E. De Jesus
U.S. Attorney's Office
3101 Federal Office Building
Chardon Avenue
Hato Rey, Puerto Rico 00917

Dear Mr. De Jesus:

This is to confirm my April 21, 1981, conversation with you concerning the depositions the Federal Election Commission will be taking on May 5 and 6, 1981. The depositions are scheduled to take place in the Conference Room in your offices at 10:00 a.m. and 2:00 p.m. on May 5, and at 10:00 a.m. on May 6. I understand you have obtained a court reporter for the depositions, as well as a notary to swear in each of the three witnesses. I also suggested that an interpreter be available on both days; however the deponents will be instructed in the cover letters to the Commission subpoenas to contact me if an interpreter is needed.

I want to take this opportunity to thank you and Mr. Montilla for your expeditious efforts and assistance in arranging these depositions. If you should have any problems or questions, please do not hesitate to call me or Marsha Gentner, Esquire at (202) 523-5071.

Sincerely,

Kenneth A. Gross
Associate General Counsel

0204033482

BS PR 81 APR 6 A9:48

# BANCO DE SANTANDER - PUERTO RICO

DIRECCION POSTAL:
G.P.O. BOX 2589
SAN JUAN, PUERTO RICO 00936

CABLES: BANSANDER
TELEX: ITT 3450062 BADERPR
ITT 3450021
RCA 3282457
RCA 3282428
WESTERN UNION 5554290

March 31, 1981

Ms. Marsha Gentner
Office of General Counsel
Federal Election Commission
1325 K Street
N. W. Washington, D. C. 20463

RE: MUR-1370

Kennedy for President
Committee/Puerto Rico
Miguel Lausell, Signator

RECEIVED
GENERAL COUNSEL
81 APR 6 A11:48

Dear Ms Gentner:

Letter dated March 12 from General Counsel, Charles N. Steele, giving instructions for the case of reference was received by our office yesterday and inmediately orders were issued to our checking account department for the copy of the material requested.

We are sorry for the delayment to furnish the material, but the letter was received at our San Juan Office to the attention of Mr. Rubén Rivera who was assigned to another Department.

Kindly accept our apology and we expect to comply to your request as soon as possible.

Sincerely,

José R. Mulero
Asst. VP Manager

imr/

MEMBER FEDERAL DEPOSIT INSURANCE CORPORATION

BS

BANCO DE SANTANDER - PUERTO RICO
G.P.O. BOX 2589
SAN JUAN, PUERTO RICO 00936

820403548

RECEIVED
31 APR 8 AM 10

SAN JUAN P.R.
P.B. METER 3002158
U.S. POSTAGE .18

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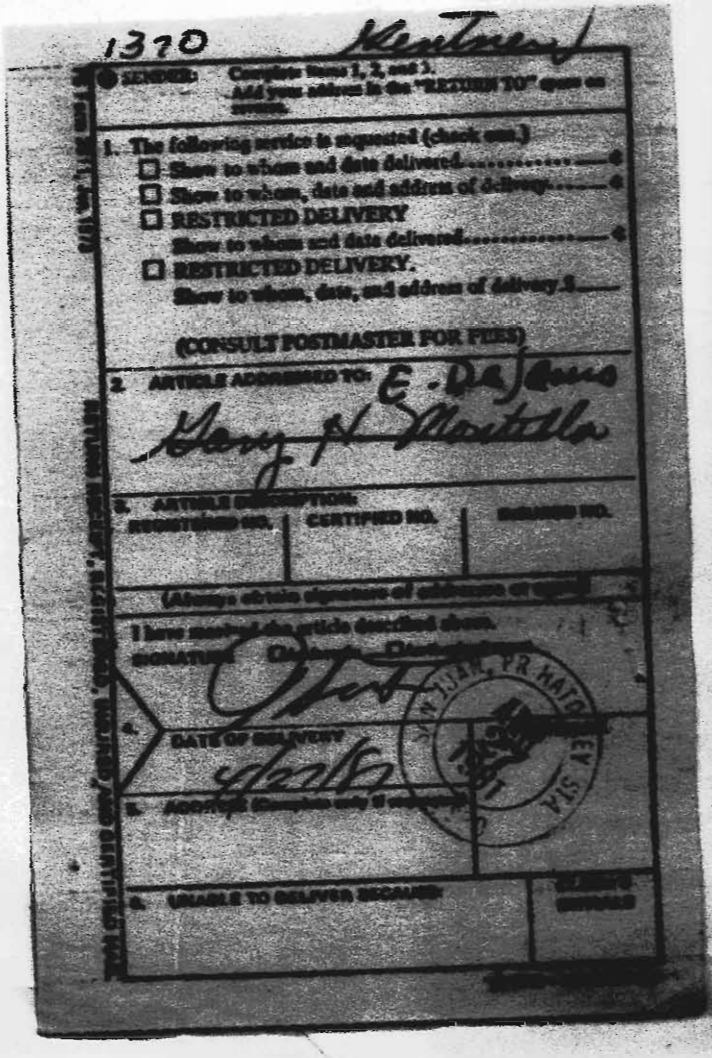
1370
Montevue
SENDER: Complete items 1, 2, and 3.
Add your address in the "RETURN TO" space on reverse.
1. The following service is requested (check one.)
Show to whom and date delivered
Show to whom, date and address of delivery
RESTRICTED DELIVERY
Show to whom and date delivered
RESTRICTED DELIVERY.
Show to whom, date, and address of delivery.$
(CONSULT POSTMASTER FOR FEES)
2. ARTICLE ADDRESSED TO:
E. DeJesus
Gary J. Montalvo
3. ARTICLE DESCRIPTION:
REGISTERED NO.
CERTIFIED NO.
INSURED NO.
(Always obtain signature of addressee or agent)
I have received the article described above.
SIGNATURE
Date
4. DATE OF DELIVERY
5. ADDRESS (Complete only if requested)
6. UNABLE TO DELIVER BECAUSE:
SERVICE
SAN JUAN, PR
FEB 15 STA

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )
Kennedy for President Committee/ ) MUR 1370
Puerto Rico )

RECEIVED
FEDERAL ELECTION
GENERAL COUNSEL
81 MAR 23 P3:47

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## RESPONSE TO INTERROGATORIES

The Kennedy for President Committee ("the Committee") submits the following responses to the interrogatories addressed to the Committee in the Federal Election Commission's Order dated February 25, 1981, and received by the Committee on March 13, 1981:

A. A review of our records indicates that, although the Committee filed amended reports to reflect expenditures from the Banco de Santander - Puerto Rico account, the Committee's Statement of Organization was not amended. The attached amendment (Exhibit "A") was filed on March 23, 1981.

B. The Committee does not know the exact day of the month on which the February and March 1980 deposits were made into the Banco de Santander - Puerto Rico account. We are requesting the information from Puerto Rico and will provide it to the Commission when available.

C. (1) The Committee understands that none of the funds raised through the radio marathon were deposited into a

bank account. (See Affidavit of Miguel A. Rivera at ¶6.)

(2) After being collected by numerous volunteers, whose names are not known to the Committee, the Committee understands that the funds were delivered to Sr. Miguel A. Rivera (See Rivera Affidavit at ¶3).

D. No records of the names and addresses of contributors to the radio marathon were kept because all contributions were either in cash or checks payable to cash and no single contribution exceeded $50. (See Rivera Affidavit at ¶¶ 4 and 5; 2 U.S.C. § 432 (b)(1), (c)(2) (Supp. III 1979).)

E. The Committee has the requested information only for the April 11, 1980, deposit. We are requesting additional information from Puerto Rico on the other deposits and will provide it to the Commission when available.

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April 11, 1980 deposit, total $6,325.00.

| Name | Address | Date | Amount |
|---|---|---|---|
| Miguel J. Fernandez, Jr. | P.O. Box 972<br>San Juan, PR 00902 | 3/10/80 | $30.00 |
| Maria L. Rodriguez | Cond. El Miramar<br>Apt. 3-A<br>Ave. Miramar Esq.<br>Olimpo-Santurce, PR 00908 | 3/10/80 | $40.00 |
| Julio Morales | Dan Jorge No. 259<br>Santurce, PR 00912 | 3/11/80 | $40.00 |
| Michelle Martin | G.P.O. Box 3036<br>San Juan, PR 00936 | 3/13/80 | $40.00 |

| Name | Address | Date | Amount |
|---|---|---|---|
| Florence C. Mendez | Apartado 200<br>Hato Rey, PR 00919 | 3/27/80 | $20.00 |
| Aida M. Arzuago | Calle 4, No. 92 Villamar<br>Isla Verde, PR 00913 | 3/10/80 | $20.00 |
| Carmen S. Ibanez | (unknown) | 3/10/80 | $20.00 |
| Victoria Rodriguez | (unknown) | 3/17/80 | $20.00 |
| Ana Luisa Bird Laborde | 216 Residente Ramirez Baldrich<br>Hato Rey, PR 00918 | 3/10/80 | $20.00 |
| Marisa Pont | (unknown) | 3/13/80 | $20.00 |
| Luz Raquel B. De Prado | (unknown) | 3/10/80 | $20.00 |
| Rita Sola | (unknown) | 3/11/80 | $20.00 |
| Ana Julia Babilonia | (unknown) | 3/10/80 | $20.00 |
| Patria del Carmen Fernandez | (unknown) | 3/17/80 | $20.00 |
| Jose A. Purvas Rivas | (unknown) | 3/11/80 | $20.00 |
| Virtudes G. De Silva | (unknown) | 3/11/80 | $20.00 |
| Marisara Pont | (unknown) | 3/27/80 | $20.00 |
| Hilda Pietri de Vega | Calle 7, B4-14<br>Alturas de Torrimar<br>Guaynabo, PR 00657 | 3/10/80 | $20.00 |
| Rosita Janer de Gaztambide | Calle Madrid 316<br>Torrimar<br>Guaynabo, PR | 3/10/80 | $20.00 |
| Irma Capillo | (unknown) | 3/8/80 | $20.00 |
| Miguel A. Rodriguez | Rodriguez Apartado 14336<br>Santurce, PR 00916 | 3/10/80 | $20.00 |
| M.P. Serbia | (unknown) | 3/10/80 | $20.00 |
| Manolita A. Noriega | Apartado 9391<br>Santurce, PR 00908 | 3/11/80 | $20.00 |

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| Name | Address | Date | Amount |
|---|---|---|---|
| Carmen Maria Agresar | P.O. Box 11620<br>Caparra Heights Sta.<br>San Juan, PR 00922 | 3/11/80 | $20.00 |
| Ing. Blanca R. de Morales | Calle-4-Do, No. 108<br>Ext. Villamar<br>Isla Verde, PR 00913 | 3/11/80 | $20.00 |
| Laura Donate de Agresar | P.O. Box 11620<br>Caparra Heights Sta.<br>San Juan, PR 00922 | 3/11/80 | $20.00 |
| Raquel M. De Iglesias | (unknown) | 3/10/80 | $20.00 |
| Sonia P. DeRios | (unknown) | 3/7/80 | $20.00 |
| Eunice M. Susoni Oharriz | (unknown) | 3/6/80 | $10.00 |
| Isabel M. Cestero | (unknown) | 3/6/80 | $15.00 |
| Maria Teresa G. Matosantos | Calle Oviedo No. 38<br>Torrimar<br>Guaynabo, PR 00657 | 3/14/80 | $20.00 |
| Lucy M. de Rodriguez Antongiorgi | G.P.O. Box 3507<br>San Juan, PR 00936 | 3/12/80 | $10.00 |
| Ana Rosado | Torrimar<br>Guaynabo, PR 00657 | 3/14/80 | $10.00 |
| Luz E. Rivera de Ayala | (unknown) | 3/11/80 | $10.00 |
| Cesar Andpeu | Garden Hills<br>Guaynabo, PR 00657 | 3/14/80 | $200.00 |
| Mario Oronoz | Suite 1105<br>Edificio Banco Popular Center<br>Hato Rey, PR 00918 | 3/11/80 | $100.00 |
| Leo Cabranes | Ave. Ponce de Leon 1510<br>Santurce, PR | 3/6/80 | $100.00 |
| Antonio Gonzalez Flores | Magnolia FF-11<br>Ext. Borinquen Gdns.<br>Rio Piedras, PR 00926 | 3/14/80 | $250.00 |

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| Name | Address | Date | Amount |
|---|---|---|---|
| Ana Rosa D. de Toro | Marginal C-29<br>Vista Allegre<br>Ponce, PR 00928 | (unknown) | $250.00 |
| Fernando F. Toro | " " | " | $250.00 |
| Gloria Morris Coll | B6 Argentina Gardenville<br>Guaynabo, PR 00657 | (unknown) | $140.00 |
| Ramon Lloveras Otero | Garden Hills<br>guaynabo, PR 00657 | 3/14/80 | $50.00 |
| Sebastian Cruz & Assoc. | Edificio El Caribe<br>San Juan, PR 00901 | 4/10/80 | $250.00 |
| Miguel A. Perez Comas | Apartado 3450<br>Mayaguez, PR 00708 | 3/10/80 | $250.00 |
| Miguel A. Deynes Soto | Box 245<br>Moco, PR 00716 | 3/12/80 | $100.00 |
| Lydia E. de Laboy | 1160 Magdalena Ave<br>Apt. 2-A<br>Condado, PR 00907 | 3/14/80 | $50.00 |
| Ma. del Carmen Taboas | Calle 9-D-1 Victor Braeger<br>Bayamon, PR 00619 | 3/14/80 | $50.00 |
| Abby E. Rodriguez | Cond. Palmas Real 8-A<br>Miramar, PR 00907 | 3/11/80<br>3/24/80 | $120.00<br>$ 60.00 |
| Maria E. Gonzalez | Calle 2-B-18 Parkside<br>Guaynabo, PR 00920 | | |
| Ramon Nuniz | Caquldea H-451<br>Caguas, PR 00625 | 3/10/80 | $500.00 |
| Enrique Vazguez, Jr. | Box 1470<br>Ponce, PR 00731 | 3/6/80 | $250.00 |
| Ramon Vega | Box 188<br>Humacao, PR 00661 | 3/5/80 | $500.00 |
| Pedro Zorilla Martinez | Citibank Tower Piso 20<br>Ave. Poncede Leon 252<br>Hato Rey, PR 00661 | 3/5/80 | $500.00 |

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| Name | Address | Date | Amount |
|---|---|---|---|
| Alberic Girod | Tetuan 355<br>San Juan, PR | 4/10/80 | $500.00 |
| Gumersindo Carmona Rivera | Box 82<br>Comerio, PR 00642 | 3/8/80 | $1000.00 |
| Agustin Ifarraguerri | Cond. El Centro 1<br>Ofic. 806<br>Ave. Munoz Rivera | 3/24/80 | $50.00 |
| Edgardo A. Gonzalez | Suite 500<br>Edif. Fomento<br>Hato Rey, PR 00918 | 3/14/80 | $100.00 |

I hereby swear that the responses given above are true, complete and accurate to the extent of my information and belief.

William C. Oldaker
Treasurer, Kennedy for President Committee

82040333492

DATED: March 23, 1981.

CITY OF WASHINGTON )
) ss.
DISTRICT OF COLUMBIA )

I, Ellen E. Martz, a Notary Public in and for the District of Columbia, duly commissioned and qualified, hereby certify that there appeared before me, William C. Oldaker, to me personally known, who swore that the responses given above are true, complete and accurate to the extent of his information and belief.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 23rd day of March, 1981, at Washington, D.C.

Ellen E. Martz
Notary Public

My Commission expires: 2/14/82

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# STATEMENT OF ORGANIZATION

(see reverse side for instructions)

| 1. (a) Name of Committee (in Full) ☐ Check if name or address is changed. | 2. Date |
|---|---|
| Kennedy for President Committee | March 23, 1981 |
| (b) Address (Number and Street) | 3. FEC Identification Number |
| | C00115022 |
| (c) City, State and ZIP Code | 4. Is this an amended Statement? ☒ YES ☐ NO |

5. TYPE OF COMMITTEE (check one):

- ☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
- ☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

| Name of Candidate | Candidate Party Affiliation | Office Sought | State/District |
|---|---|---|---|
| | | | |

- ☐ (c) This committee supports/opposes only one candidate _____ and is NOT an authorized committee. (name of candidate)
- ☐ (d) This committee is a _____ committee of the _____ Party. (National, State or subordinate) (Democratic, Republican, etc.)
- ☐ (e) This committee is a separate segregated fund.
- ☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

| 6. Name of Any Connected Organization or Affiliated Committee | Mailing Address and ZIP Code | Relationship |
|---|---|---|
| | | |

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

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

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

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

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

| Full Name | Mailing Address and ZIP Code | Title or Position |
|---|---|---|
| | | |

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

| Name of Bank, Depository, etc. | Mailing Address and ZIP Code |
|---|---|
| Banco de Santander - Puerto Rico | G.P.O. Box 2589<br>San Juan, Puerto Rico 00936 |

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

| William C. Oldaker | | March 23, 1981 |
|---|---|---|
| Type or Print Name of Treasurer | SIGNATURE OF TREASURER | Date |

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

For further information contact: Federal Election Commission, Toll Free 800-424-9530, Local 202-523-4068

| | | | | | | | | | FEC FORM 1 (3/80) |
|---|---|---|---|---|---|---|---|---|---|
| | | | | | | | | | |

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WILLIAM G. OLDAKER
ATTORNEY AT LAW
1050 SEVENTEENTH STREET, N. W.
WASHINGTON, D. C. 20036

TELEPHONE
202 296-0505

CABLE ADDRESS: "CHALGRAY"
TID-828-8367

91145

80 DEC 4 P1:22

ACC # 3470

December 2, 1980

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

RECEIVED
FEDERAL ELECTION COMMISSION
80 DEC 4 P1:22
OFFICE OF GENERAL COUNSEL

Re: Kennedy for President Committee/
Puerto Rico

Dear Mr. Steele:

During the course of the presidential primary campaign in Puerto Rico, several unintentional violations of the Federal Election Campaign Act of 1971, as amended, occurred. This letter sets forth the errors which led to the unintentional violations of the Act in the hopes of reaching an amicable and voluntary resolution of the problem.

In order to fully understand the event, which took place during the Democratic presidential campaign in Puerto Rico, it is necessary to understand the unique part which the Commonwealth of Puerto Rico plays in our political structure. Further, it is necessary to understand the procedure which is ordinarily followed by the national campaign office in regard to all receipts and expenditures.

The first time that individuals in Puerto Rico participated in a federal primary was in 1976, during the presidential primary contest. Since Puerto Rico elects only a non-voting Resident Commissioner to Congress, little attention has ever been paid by the residents of Puerto Rico to the Federal Election Campaign Act. Parties themselves in Puerto Rico are somewhat blurred in the traditional sense. There is no Democratic or Republican party, as we know it, in the rest of the country. There are two principal parties in Puerto Rico which traditionally vie for the vast majority of the seats in the Puerto Rican legislature as well as for the gubernatorial race. These parties are the New Progressive Party and the Popular Democratic Party. Three other parties play a lesser role in the Commonwealth's political structure. The two

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principal parties differ on many traditional Puerto Rican issues, but are split most decisively on the status of Puerto Rico. The Popular Democratic Party is in favor of Puerto Rico continuing in its commonwealth status, while the New Progressive Party wishes the Commonwealth to apply for statehood. Traditionally, both of the major parties have been aligned with the Democratic National institutions. In the 1980 presidential primary campaign, the Popular Democratic Party supported Edward M. Kennedy and the New Progressive Party supported Jimmy Carter. It should be noted that the New Progressive Party also supported a Republican candidate in the Republican primary which was held a short time before the Democratic primary. The presidential primary on the Democratic side of Puerto Rico thus became somewhat of a test vote between the two antagonistic factions of the Democratic National structure. This led to a strong local interest in the presidential primary, with ramifications going beyond the primary victory of one presidential candidate.

Procedures as followed by The Kennedy for President Committee on a fairly uniform basis nationwide were that all contributions would be deposited into the national depository which was from October 29, 1979 until April 1, 1980, the National Savings & Trust of Washington, D.C., and from April 1, 1980 until the present time, the District of Columbia National Bank. Money collected locally in the states was sent to Washington for deposit in a central depository. In many cases, an equivalent amount of money was returned to the local level to be spent by the local campaign on primary activities in that state. The purpose of this procedure was to allow the treasurer to review all receipts and report them correctly to the Federal Election Commission. The general procedure on expenditures was that each field office was to pay all bills locally incurred from the local depository. No cash expenditures were to be made other than those specifically authorized as "Petty Cash" expenditures. Each local field office was required to send the treasurer a monthly report of all of their expenditures.

A checking account for The Kennedy for President/ Puerto Rico campaign was opened on January 18, 1980, at the Banco de Santander, G.T.O. Box 2589, San Juan, Puerto Rico, Account No. - . The sole signator on this account was Miguel Lausell, the Director of the Puerto Rican campaign.

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Unfortunately, this checking account was not timely registered with the Federal Election Commission.

During the course of the campaign, in several instances, local officials directly deposited funds which were raised locally into the account located at the Banco de Santander. The Commission may wish to take note of the fact that the mail communication system to the Commonwealth of Puerto Rico from Washington, D.C. is at best a very lengthy procedure. Local officials in Puerto Rico, realizing this, felt that at various times during the campaign it was simply too cumbersome to forward these locally collected receipts to Washington and to await their return to the local account. In at least one instance, the local checking account had been overdrawn and it was necessary to make a deposit immediately. Our records currently indicate that five deposits were made locally into the account at the Banco de Santander. These local deposits total $12,710. This money was collected locally, oftimes evidenced by check and signature card, and in no case was cash in excess of $50 accepted from any individual. Because of a lack of understanding at the local level, these deposits which were made into the Banco de Santander from local campaign funds were never reported to the national office in Washington, and consequently were not included in the monthly Federal Election Commission reports, resulting in an unintentional violation of 11 C.F.R. § 104.3.

Another problem inadvertently arose in the campaign in Puerto Rico when the local campaign used a fundraising technique which is somewhat unique to the Commonwealth of Puerto Rico. This type of fundraising technique is loosely called a marathon. The hallmark of this type of activity is a one-day radio or TV blitz where, for a full day on a number of radio and/or TV stations, a show is put on by various celebrities, both political and from the entertainment world. During this marathon, which is broadcast throughout the Commonwealth, money is brought to various locations which have been predetermined. A running total of the contributions that have been made is continuously broadcast. Also, on almost every busy street-corner in Puerto Rico, there is a person who is soliciting mass contributions to the marathon, sometimes handing out literature and requesting that donations be dropped into a bucket. In many locales throughout the Commonwealth, persons are assigned quotas to raise for the marathon. These people will, in some instances, start raising the money a short period of time prior to the radio marathon, and then on the date of the marathon, turn these small contributions in to their local coordinator.

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During the presidential primary campaign, The Kennedy for President Committee in Puerto Rico held just such an island-wide radio marathon to raise funds for the primary effort in Puerto Rico. Several problems rose in connection with this island-wide radio marathon which raised $99,233.33. The radio marathon was held shortly before the date of the primary in Puerto Rico. Because of the short period of time and in view of the need for additional radio and television media, the local campaign officials felt compelled to keep the money locally. A deposit for time buys was made with a local advertising agency, Ileana, Lopita and Howie. Giulio Hector Morales, an employee of Ileana, Lopita and Howie, acknowledged receipt of $88,230.33 in cash. The remainder of the money raised through the radio marathon, $11,000, was paid to David Sawyer, Inc., for the production costs in connection with these commercials. Mr. Sawyer was paid in the form of bank checks issued by the Banco Popular de Puerto Rico (see exhibits, attached).

Since there was no established procedure set forth by the national committee for handling such local payments, the local committee inadvertently erred in not reporting these expenditures to the national office; consequently, no report disclosing these contributions and expenditures were timely made with the FEC. Further, the local committee failed to deposit these contributions into a depository as required by 11 C.F.R. § 103.2.

The Puerto Rico campaign officials misunderstood the FEC's accounting and reporting requirements and, because of their special local situation, felt they could not adhere to the normal procedure established by the national office. We therefore did not become aware of these transactions until informed by third parties after the event. The national office then took steps to ascertain the full facts of the situation in an effort to bring the Puerto Rico committee into compliance. These steps included requests for information on the committee's receipts and expenditures and a trip by campaign counsel to Puerto Rico to investigate the matter. Due to the remoteness of Puerto Rico and difficulties in making the local officials fully understand what information was required, we were able to obtain affidavits from these officials only recently. The affidavits of Miguel D. Lausell, Campaign Director of the Puerto

Rico Kennedy for President Committee, and Miguel A. Rivera, a local fundraiser, are enclosed. (Please note that due to a typographical error the date given in Sr. Rivera's affidavit for the opening of the Banco de Santander account is June 18, 1980, instead of January 18, 1980.)

It is our strong feeling that though these violations are not de minimus in nature, they occurred through the lack of understanding of various well-intentioned persons in the Commonwealth of Puerto Rico. It is our hope that these disclosures will commence discussions with the aim of amicably settling these inadvertent violations of the Federal Election Campaign Act and the Federal Election Commission's regulations.

Sincerely,

William C. Oldaker

Enclosures

WCO:mlk

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**SWORN STATEMENT**

I, MIGUEL D. LAUSELL, of legal age, married, a lawyer and a resident of Guaynabo, Puerto Rico, as Campaign Director of the Kennedy for President Committee in Puerto Rico, do hereby swear:

1. That my personal circumstances are the above-mentioned.

2. That during the months of February, March, April and June, 1980 deposits were locally made into the Kennedy for President-Puerto Rico account.

3. A checking account was opened for the Kennedy for President-Puerto Rico on June 18, 1980 at Banco de Santander-Puerto Rico San Juan, Puerto Rico.

4. That during the course of the campaign numbers of small cash contributions were received by the Kennedy For President Committee in Puerto Rico.

5. That none of these contributions from individuals exceeded $50.00 in cash.

6. That in many instances, contributions were made by checks accompanied by signature cards.

7. That during the campaign it was necessary to deposit some of these contributions in our account at Banco de Santander-Puerto Rico.

8. That during the month of February two deposits were made, the first for $4,000.00 and the second for $2,000.00.

9. That during March, 1980 a deposit in the amount of $20.00 was made.

10. That during April, 1980 a deposit in the amount of $6,325.00 was made. (See attachment A)

11. That during June, 1980 a deposit in the amount of $365.00 was made. (See attachment B)

In San Juan, Puerto Rico, this 25th day of November, 1980.

MIGUEL D. LAUSELL

Affidavit Number 387

Sworn to and subscribed before me by Miguel D. Lausell, of the personal circumstances above-mentioned, to me personally known at San Juan, Puerto Rico this 25th day of November, 1980.

NOTARY PUBLIC

ABOGADO NOTARIO

SAN JUAN, PUERTO RICO

2040335 1

OFFICIAL CHECK

NO 1-024-065093 March 11, 1980 $**200.00**

PAY 200 00

TO THE ORDER OF: OVER $500.00 TWO SIGNATURES REQUIRED

CAMPAÑA KENNEDY FOR PRESIDENT Hector Cuba Courtesy

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

⑈024065093⑈ ⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other 200

Name CESAR ARROYO

Address Garden Hills, Guaynabo

City & State Puerto Rico Zip Code 00657

Federal law requires us to request the following information:

Occupation: Lawyer

Name of employer:

Principal place of business: Bufete Mario M. Oronoz, Hato Rey

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature:

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington D.C.

LICENCIADO MARIO M. ORONOZ
CUENTA BUFETE
SUITE 1105 EDIFICIO BANCO POPULAR CENTER
HATO REY, P. R. 00918

No. 2515
101-201
215

March 11 19 80

PAY TO THE ORDER OF KENNEDY FOR PRESIDENT COMMITTEE $100:00

******ONE HUNDRED********** 00/100 DOLLARS

LICENCIADO MARIO M. ORONOZ
CUENTA BUFETE

AUTHORIZED SIGNATURE

BANCO POPULAR DE PUERTO RICO
BANCO POPULAR CENTER BRANCH
SAN JUAN, PUERTO RICO

⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☒ $100 ☐ $50 ☐ $15 ☐ Other

Name MARIO ORONOZ

Address

City & State Zip Code

Federal law requires us to request the following information

Occupation

Name of employer

Principal place of business

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature:

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

LEO CABRANES

No. 119

0 2 0 4 0 3 3 3 5 0 March 6 19 80 101-201 215

PAY TO THE ORDER OF Comte. Pro Kennedy $ 100.00

Cien ——— 00 DOLLARS

BANCO POPULAR DE PUERTO RICO
STOP 22 BRANCH
SANTURCE, PUERTO RICO

FOR ———

⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☑ $100 ☐ $50 ☐ $15 ☐ Other

Name Leo Cabranes
Address Ave. Ponce de Leon 1510
City & State Santurce, P.R. Zip Code ———

Federal law requires us to request the following information:
Occupation: Director Ejecutivo Asociacion de Alcalde
Name of employer: ———
Principal place of business: ———

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account I understand that federal law prohibits corporate contributions.

Signature: ———

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

ANTONIO GONZALEZ FLORES Y/O
ZULMA M. GONZALEZ
MAGNOLIA FF-11 EXT. BORINQUEN GDNS.
RIO PIEDRAS, P.R. 00926

1526

Mar 14 19 80 101-209 215

PAY TO THE ORDER OF Kennedy for President $ 250=

Doscientos cincuenta ——— DOLLARS

BANCO DE PONCE
SUCURSAL EL SEÑORIAL
EL SEÑORIAL PLAZA
RIO PIEDRAS, PUERTO RICO

FOR ———

⑆021502095⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Antonio Gonzalez Flores y/o Zulma Gonzalez
Address Magnolia FF-11 Ext Borinquen Gardens
City & State Rio Piedras P.R. Zip Code 00926

Federal law requires us to request the following information.
Occupation Propietario
Name of employer: ———
Principal place of business. ———

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account I understand that federal law prohibits corporate contributions

Signature: ———

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

0041438

UNITED FEDERAL SAVINGS AND LOAN ASSOCIATION OF PUERTO RICO
Caparra Heights • Barrio Obrero • Hato Rey • Lajas • Mayagüez Mall
Norte Shopping Center • Rio Piedras • Santurce • Torrimar

794-08-8

Not Valid Over $500.00

Date

101-212
215

MONEY ORDER

Pay to the Order of Kennedy for President

UNITED FEDERAL SAVINGS 250

Drawn on Federal Home Loan Bank of New York San Juan, Puerto Rico

SENDER (please print) Ana Rosa del Toro

ADDRESS

United of Puerto Rico
DRAWER

⑈0041438⑈ ⑆021502121⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Ana Rosa del Toro
Address [illegible] Vista Alegre
City & State [illegible] Zip Code 00923

Federal law requires us to request the following information:
Occupation: [illegible]
Name of employer: [illegible]
Principal place of business. [illegible]

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Ana Rosa del Toro

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

C 00?

0041439

UNITED FEDERAL SAVINGS AND LOAN ASSOCIATION OF PUERTO RICO
Caparra Heights • Barrio Obrero • Hato Rey • Lajas • Mayagüez Mall
Norte Shopping Center • Rio Piedras • Santurce • Torrimar

794-08-8

Not Valid Over $500.00

Date

101-212
215

MONEY ORDER

Pay to the Order of Kennedy for President

UNITED FEDERAL SAVINGS 250

Drawn on Federal Home Loan Bank of New York San Juan, Puerto Rico

SENDER (please print) Fernando F. Toro

ADDRESS

United of Puerto Rico
DRAWER

⑈0041439⑈ ⑆021502121⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name FERNANDO TORO
Address MARGINAL C-29 VISTA ALEGRE
City & State PONCE, P.R. Zip Code 00731

Federal law requires us to request the following information:
Occupation RETIRED
Name of employer —
Principal place of business. —

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Fernando F. Toro

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

C 00?

MONEY ORDER

UNITED Federal Savings 3 5 4 — 0041440

AND LOAN ASSOCIATION OF PUERTO RICO
Caparra Heights · Barrio Obrero · Hato Rey · Lajas · Mayagüez Mall
Norte Shopping Center · Río Piedras · Santurce · Torrimar

Not Valid Over $500.00

Date — 101-212 / 215

Pay to the Order of Kennedy for President

UNITED FEDERAL SAVINGS — $ 10.00

Drawn on Federal Home Loan Bank of New York San Juan, Puerto Rico

SENDER (please print) Gloria Morris Coll

ADDRESS

United of Puerto Rico
DRAWER

⑈004144⓪⑈ ⑆021502128⑆

---

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name GLORIA MORRIS COLL
Address P/C ARGENTINA GARDENVILLE
City & State GUAYNABO, P.R. Zip Code 00657

Federal law requires us to request the following information:
Occupation HOUSEWIFE
Name of employer:
Principal place of business:

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Gloria Morris Coll

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington D.C.

C-984

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THIS CHECK IS DELIVERED IN CONNECTION WITH THE FOLLOWING ACCOUNT (S)

| DATE | | AMOUNT | |
|---|---|---|---|
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IF INCORRECT PLEASE RETURN NO RECEIPT NECESSARY

LCDO. RAMON LLOVERAS OTERO
APARTADO 895
SAN JUAN, P.R. 00902

No. 80-84

101.205 / 215

14 de marzo de 19 80

PAY TO THE ORDER OF Kennedy for President Committee $ 50.00

------CINCUENTA con 00/00---------- DOLLARS

BANCO de San Juan
SAN JUAN, P. R.

⑆021502053⑆

---

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name RAMON LLOVERAS
Address GARDEN HILLS
City & State GUAYNABO, P.R. Zip Code 00657

Federal law requires us to request the following information:
Occupation LAWYER
Name of employer:
Principal place of business APARTADO 895 - SAN JUAN, P.R. 00902

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature:

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington D.C.

C 984

OFFICIAL CHECK

Banco Popular de Puerto Rico
SAN JUAN, PUERTO RICO
⑆ 2 0 4 0 3 3 3 5 ⑆ 5

NO. 1-031-172845

Abril 10-80 $250.00

B.P.P.R.
RIO PIEDRAS $250 AND 00 CTS

PAY
TO THE ORDER OF:

KENNEDY FOR PRESIDENT

OVER $500.00 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

⑈031172845⑈ ⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Sebastian Cruz & Associates
Address Edificio El Caribe
City & State San Juan, P.R. Zip Code 00901

Federal law requires us to request the following information:
Occupation: Insurance
Name of employer: Sebastian Cruz & Associates
Principal place of business: Edificio El Caribe, San Juan

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Sebastian Cruz

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

GENERAL ACCOUNT

NO. 35530

101-208
213

banco de ahorro del oeste
MIEMBRO FDIC
MAYAGUEZ, PUERTO RICO

10 de marzo de 19 80

Pay [illegible] 250 00

DOLLARS $ 250.00

TO THE ORDER OF:

TWO SIGNATURES REQUIRED

Kennedy for President

M. A. C. P. Pérez

Maximino Colón

BS PR BANCO DE SANTANDER -PUERTO RICO, NA
MAYAGUEZ, PUERTO RICO ⑆021502341⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☒ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Miguel A. Pérez Comas
Address Apto. 3450
City & State Mayaguez, P.R. Zip Code 00708

Federal law requires us to request the following information.
Occupation self employed - executive
Name of employer
Principal place of business

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Miguel A. Pérez Comas

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

552

MIGUEL A. DEYNES SOTO
BOX 245
MOCA, PR 00716

0 4 0 3 12 de marzo 6 1980

101-234
215

Pay to the order of ---Comité Ted Kennedy P. R.---------- $ 100.00

Cien con----------00/100---Dollars

BS PR BANCO DE SANTANDER -PUERTO RICO
SUCURSAL DE SAN SEBASTIAN
SAN SEBASTIAN, PUERTO RICO

For Contribución

Miguel A. Deynes Soto

⑈021502341⑈

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Miguel A. Deynes Soto
Address Box 245
City & State Moca, P.R. Zip Code 00716

Federal law requires us to request the following information:
Occupation: self employed
Name of employer:
Principal place of business:

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Miguel A. Deynes Soto

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C

679

ULISES LABOY FERNANDEZ Y/O
LYDIA A. DE LABOY
1160 MAGDALENA AVE. APT. 2 A
CONDADO, P.R. 00907

3-14 1980

101-209
215

PAY TO THE ORDER OF Kennedy For President $ 50.00

Cincuenta con 00/100 DOLLARS

BANCO DE PONCE
TANCA AND RECINTO SUR BRANCH
SAN JUAN, PUERTO RICO

FOR

Lydia E. de Laboy

⑈021502095⑈

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☒ $50 ☐ $15 ☐ Other

Name Lydia E. de Laboy
Address 1160 Magdalena Ave. Apt. 2-A
City & State Condado, P.R. Zip Code 00907

Federal law requires us to request the following information:
Occupation housewife
Name of employer
Principal place of business

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Lydia E. de Laboy

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C

145

LCD MA. DEL CARMEN TABOAS
CALLE 9 D-1 EXT. VICTOR BRAEGUER
BAYAMON, P.R. 00619 3 3 3 March 14, 1980 101-206/215

PAY TO THE ORDER OF Kennedy for President $ 50.00

Cincuenta con 00/100 DOLLARS

THE CHASE MANHATTAN BANK
National Association
Hato Rey Branch, Hato Rey, Puerto Rico 6-6

FOR _____ Ma. del Carmen Taboas

⑈021502066⑈

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☒ $50 ☐ $15 ☐ Other

Name Ma. del Carmen Taboas
Address Calle 9-D-1 Victor Braeger
City & State Bayamon, P.R. Zip Code 00619

Federal law requires us to request the following information:
Occupation self employed - lawyer
Name of employer: _____
Principal place of business: _____

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Ma. del Carmen Taboas

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

C 98

ABBY E. RODRIGUEZ
COND. PALMAS REAL 8-A
MIRAMAR, P.R. 00907

0952

March 11, 1980 101-206/215

PAY TO THE ORDER OF Kennedy for President $ 120.00

ciento veinte con 00/100 DOLLARS

CITIBANK
Citibank, N.A. San Juan, P.R. 00901

FOR Jaquilin Kenedy Abby E. Rodriguez

⑈021502040⑈

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Abby E. Rodríguez
Address Con. Palma Real 8-A
City & State Miramar, P.R. Zip Code 00907

Federal law requires us to request the following information:
Occupation housewife
Name of employer: _____
Principal place of business. _____

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Abby E. Rodriguez

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

C 98

PEDRO TOLOSA Y/O
MARIA E. GONZALEZ DE TOLOSA Y JOSE E. TOLOSA
CALLE 2 B-18 PARKSIDE
CAPARRA, PUERTO RICO 00920

357

Oct 3 1963 19 F= 101-204/215

PAY TO THE ORDER OF Citizens Kennedy for President $ 60.00/100

Sixty 60/100 DOLLARS

FIRST NATIONAL CITY BANK
NEW PORT BRANCH
PUERTO NUEVO, PUERTO RICO

FOR

⑆021500204⑆

María E. Tolosa

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☒ Other 60.00

Name María E. Gonzalez

Address Calle 2 B-18 Parkside

City & State Caparra P.R. Zip Code 00920

Federal law requires us to request the following information:

Occupation: housewife

Name of employer:

Principal place of business.

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: María E. Tolosa

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

C-504

DATE 3-10-80

DETAILS OF PAYMENT Cash

Citibank, N.A
Puerto Rico Rio Piedras 06

⑆204033359⑈ 248570

101-209/215

FNCB RIO PIEDRAS $500 AND 00 CTS

$ *500.00

PAY TO THE ORDER OF

Kennedy for President

AUTHORIZED SIGNATURE

⑈ 2⑆09⑆024857 0⑈

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☒ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Lcdo. Ramon Nuñez
Address [illegible]
City & State Cayey, P.R. Zip Code 00625

Federal law requires us to request the following information:
Occupation:
Name of employer:
Principal place of business:

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Lcdo. Ramón Nuñez

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

FEC 583

ENRIQUE VAZQUEZ, JR.
BOX 842
PONCE, PUERTO RICO 00731

4561

101-209/215

6 de marzo 1980

PAY TO THE ORDER OF Kennedy for President $250.00

Dos cientos cincuenta No/100 DOLLARS

BANCO DE PONCE
PONCE, PUERTO RICO 00731

MEMO

Enrique Vazquez Jr.

⑆021502095⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☑ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name MR. ENRIQUE VAZQUEZ JR.
Address P.O. Box 1470
City & State Ponce, P.R. Zip Code 00731

Federal law requires us to request the following information:
Occupation: Executive Insurance Co.
Name of employer: Enrique Vazquez, Inc.
Principal place of business: Ponce Puerto Rico

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Enrique Vazquez Jr.

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

FEC 583

R[illegible]ON VEGA SOSA

1885

0 2 0 4 0 3 3 3 [illegible] 19 80

101-201
215

PAY TO THE ORDER OF Kennedy for President $ 500 00

Quinientos DOLLARS

BANCO POPULAR DE PUERTO RICO
PUERTA DE TIERRA BRANCH
SAN JUAN, PUERTO RICO

FOR

Ramón Vega S

⑆021500201⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☑ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Ramón Vega
Address Box 187
City & State Humacao, P.R. Zip Code 00661

Federal law requires us to request the following information:
Occupation: Business
Name of employer: Self
Principal place of business: P.R.

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Ramón Vega S

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission Washington, D.C.

LCDO. PEDRO ZORRILA MARTINEZ
CITIBANK TOWER PISO 20
AVE. PONCE DE LEÓN 252
HATO REY, P.R. 00917

2022

[illegible] 19 80

101-272
215

PAY TO THE ORDER OF Kennedy for President $ 500 00/100

Quinientos 00/100 DOLLARS

BANCO CENTRAL Y ECONOMIAS
Santurce, Puerto Rico

FOR

Pedro Zorrilla Martinez

⑆021502723⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☒ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Pedro Zorrilla Martinez
Address Citibank Tower Piso 20
City & State Ave. Ponce de Leon 252 Zip Code 00917

Federal law requires us to request the following information:
Occupation: Lawyer
Name of employer: SELF-Employed
Principal place of business:

This contribution is my personal contribution made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature:

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission Washington, D.C.

Girod Trust Company
OLD SAN JUAN, PUERTO RICO

101-278
215

MANAGER'S CHECK ⑆ 2 0 4 0 3 3 3 5 1 ⑆ № 1608

DATE 10 de abril, 1980 $ **500.00*****

PAY TO THE ORDER OF ***Kennedy For President***********

GIROD TRUST [illegible] 50 [illegible] DOLLARS

Authorized Signature

⑈001608⑈ ⑆021502781⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☑ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Alberic Girod
Address Tetuan 355
City & State San Juan P.R. Zip Code

Federal law requires us to request the following information:
Occupation self employed - executive
Name of employer:
Principal place of business:

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature:

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

GUMERSINDO CARMONA RIVERA
COMERIO, P.R. 00642
BOX 82

320

May 5 19 80

101-201
215

Pay to the order of Kennedy for President $1,000.00

Mil 00/100 Dollars

BANCO POPULAR DE PUERTO RICO
COMERIO, PUERTO RICO

For

⑆021502011⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☑ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Gumersindo Carmona Rivera
Address Box 82
City & State Comerio P.R. Zip Code 00642

Federal law requires us to request the following information:
Occupation: Hotel & Casino
Name of employer:
Principal place of business:

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

357

AGUSTIN IFARRAGUERRI M.D.
Y/OANITA O. DE IFARRAGUERRI
COND. EL CENTRO I OFIC. 806 AVE. MUNOZ RIVERA 530
HATO REY, P.R. 00918

March 24, 19 80 — 101-266 / 215

PAY TO THE ORDER OF Cash — $ 30.00

Fifty with no/100 — DOLLARS

ROIG COMMERCIAL BANK
SANTURCE, PUERTO RICO

FOR Contribucion

Agustin Ifarraguerri

⑆021502668⑆

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☐ $100 ☐ $50 ☐ $15 ☐ Other

Name Agustin Ifarraguerri
Address Cond. El Centro I Ofic 806 Ave. Munoz.
City & State Rivera 530 Hato Rey, P.R. Zip Code 00918

Federal law requires us to request the following information:
Occupation
Name of employer Doctor
Principal place of business

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: Agustin Ifarraguerri

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

A copy of our report is filed with and is available for purchase from the Federal Election Commission, Washington, D.C.

122

EDGARDO A. GONZALEZ Y/O
OLGA ALVAREZ DE GONZALEZ
SUITE 500 EDIF. FOMENTO
HATO REY, PUERTO RICO 00918

MARCH 14, 19 80 — 101-209 / 215

PAY TO THE ORDER OF KENNEDY FOR PRESIDENT — $ 100.00

ONE HUNDRED WITH 00/100 — DOLLARS

BANCO DE PONCE
SUCURSAL EL SEÑORIAL
EL SEÑORIAL PLAZA
RIO PIEDRAS, PUERTO RICO

FOR

Edgardo A. Gonzalez

⑆021502095⑆

HARLAND 416

KENNEDY FOR PRESIDENT COMMITTEE
1250 22nd Street N.W.
Washington, D.C. 20037

Make checks payable to Kennedy for President Committee

☐ $1,000 ☐ $500 ☐ $250 ☒ $100 ☐ $50 ☐ $15 ☐ Other

Name [illegible]
Address [illegible]
City & State [illegible] Zip Code 00918

Federal law requires us to request the following information:
Occupation
Name of employer
Principal place of business

This contribution is my personal contribution, made with my personal funds and is not drawn on any corporate account. I understand that federal law prohibits corporate contributions.

Signature: [illegible]

Paid for by the Kennedy for President Committee
Federal Law prohibits corporate contributions

8 2 0 4 0 3 3 3 5 1 3

FNWN2-00031-R06 76

DEPOSITADO CON / DEPOSITED WITH

BS PR BANCO DE SANTANDER PUERTO RICO

Los depósitos se harán sujeto a cobro final y sujeto a las reglas y reglamentos de este banco en vigencia ahora o en el futuro, las cuales están contenidas en el contrato de cuenta entre el Banco y el depositante.
The deposit is accepted subject to final payment and subject to the rules and regulations of this bank, now or hereafter in force which are contained in depositor checking account agreement with the bank.

PARA ACREDITAR A
FOR ACCOUNT OF

Kennedy for PR Chapter

ESCRIBA LETRA DE MOLDE-PLEASE PRINT

DIRECCION ADDRESS

LA CUENTA PERTENECE A
ACCOUNT IS CARRIED AT Fomento Branch
SUCURSAL-BRANCH

NUMERO DE CUENTA - ACCOUNT NUMBER

6/13/ 1960

| | | DOLLARS | CENTS |
|---|---|---|---|
| EFECTIVO CASH → | | | |
| DETALLE LOS CHEQUES LIST CHEQUES | 1 | $ 130 | 00 |
| | 2 | 100 | 00 |
| | 3 | 15 | 00 |
| | 4 | 40 | 00 |
| | 5 | 40 | 00 |
| | 6 | 40 | 00 |
| | 7 | | |
| | 8 | | |
| TOTAL → | 9 | $ 365 | 00 |

Al endosar sus cheques incluya su número de cuenta. Endorse your checks including your account number.

CUSTOMER'S COPY

DEPOSITED WITH

BANCO DE SANTANDER (PUERTO RICO)

DEPOSITADO CON

PARA ACREDITAR A
FOR ACCOUNT OF

1-11- 19 [illegible]

| | | DOLLARS | CENTS |
|---|---|---|---|
| EFECTIVO CASH → | | 2,310. | 00 |
| DETALLE LOS CHEQUES LIST CHECKS | 1 | 705. | 00 |
| | 2 | 3,320. | 00 |
| | 3 | | |
| | 4 | | |
| | 5 | | |
| | 6 | | |
| | 7 | | |
| | 8 | | |
| TOTAL → | $ | 6,335. | 00 |

NOMBRE LETRA DE MOLDE-PLEASE PRINT

DIRECCION ADDRESS

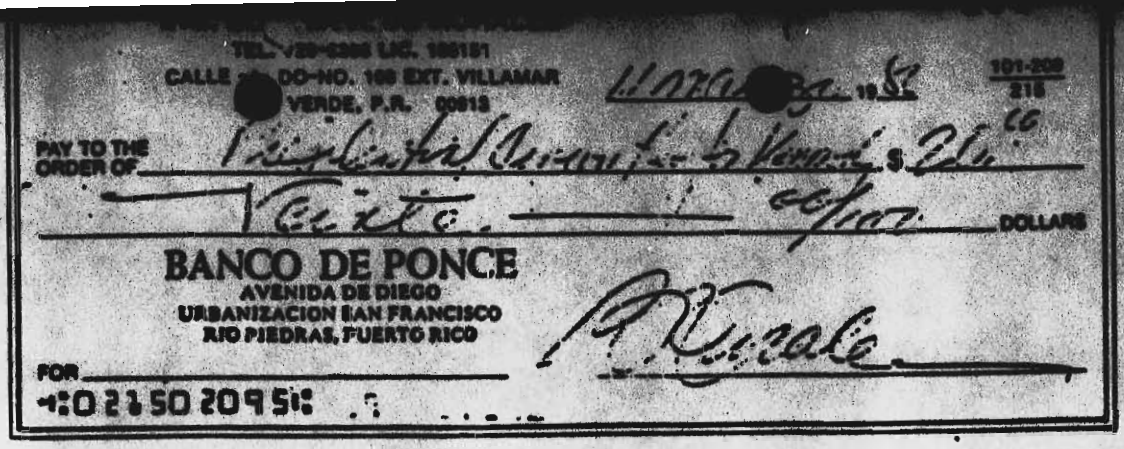
LA CUENTA PERTENECE A
ACCOUNT IS CARRIED AT _____ SUCURSAL BRANCH

NUMERO DE CUENTA ACCOUNT NUMBER

Al endosar sus cheques incluya su número de cuenta. Endorse your checks including your account number.

CUSTOMER'S COPY

8 2 0 4 0 3 3 3 5 1 4



TEL. [illegible] LIC. 105151
CALLE [illegible] DO-NO. 169 EXT. VILLAMAR
VERDE, P.R. 00918

[illegible] 19 80 101-209/215

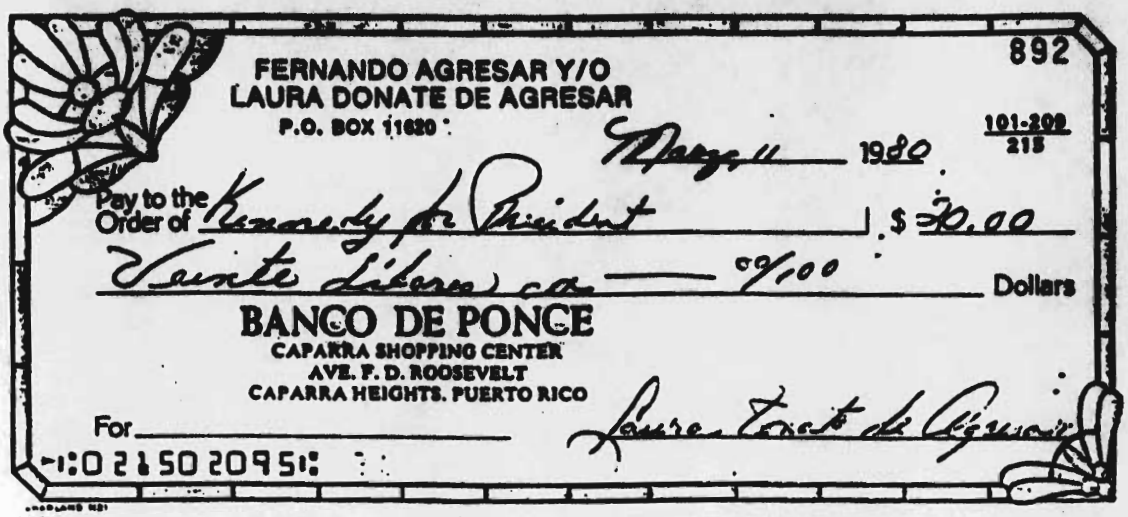
PAY TO THE ORDER OF Principal Assoc. for Vermont $ 20.

Veinte con 00/100 DOLLARS

BANCO DE PONCE
AVENIDA DE DIEGO
URBANIZACION SAN FRANCISCO
RIO PIEDRAS, PUERTO RICO

FOR [illegible]

⑆021502095⑆



892

FERNANDO AGRESAR Y/O
LAURA DONATE DE AGRESAR
P.O. BOX 11620

March 11 1980 101-209/215

Pay to the Order of Kennedy for President $ 20.00

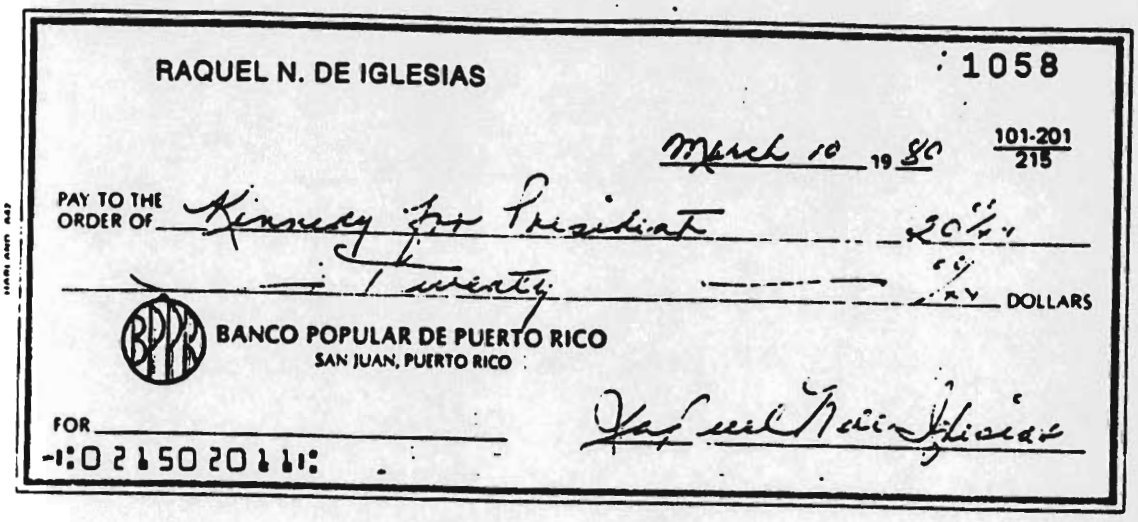
Veinte Libras con 00/100 Dollars

BANCO DE PONCE
CAPARRA SHOPPING CENTER
AVE. F. D. ROOSEVELT
CAPARRA HEIGHTS, PUERTO RICO

For [illegible]

Laura Donate de Agresar

⑆021502095⑆



RAQUEL N. DE IGLESIAS 1058

March 10 1980 101-201/215

PAY TO THE ORDER OF Kennedy for President 20 00/100

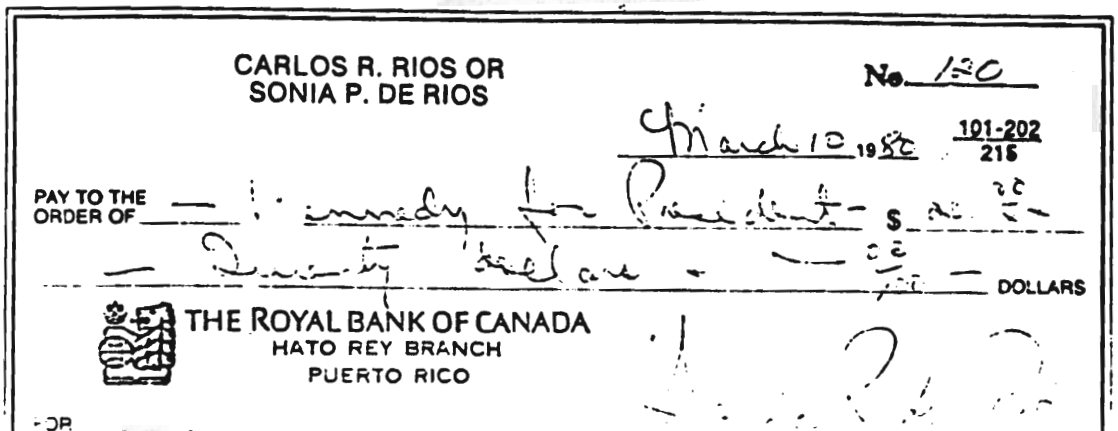
Twenty 00/100 DOLLARS

BPPR BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

FOR [illegible]

Rafael Rios Iglesias

⑆021502011⑆



CARLOS R. RIOS OR
SONIA P. DE RIOS

No. 130

March 10 1980 101-202/215

PAY TO THE ORDER OF Kennedy for President $ 20.00

Twenty Dollars and 00/100 DOLLARS

THE ROYAL BANK OF CANADA
HATO REY BRANCH
PUERTO RICO

FOR [illegible]

[illegible]

0204033515

8204033335 16

OFFICIAL CHECK

# BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

1-881
260

90040183

58-12-1

MARCH 19,1980. $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B.P.P.R. POPULAR CENTER 3000 DOLS 00 CTS ---------- DOLLARS

OVER $500.00 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

"90040183" 1:

OFFICIAL CHECK

# BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

1-881
260

90040186

58-12-1

MARCH 19,1980. $**2,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B.P.P.R. POPULAR CENTER 2000 DOLS 00 CTS ---------- DOLLARS

OVER $500.00 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

"90040186"

8 2 0 4 0 3 3 3 5 1 7

# BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

90040184

58-12-1

MARCH 19, 1980. $**3,000.00**

OFFICIAL CHECK

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B. P. P. R. POPULAR CENTER 3000 DOLS 00 CTS ---------- DOLLARS

OVER $300.00 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

"90040184"

# BANCO POPULAR DE PUERTO RICO

1-891
260

SAN JUAN, PUERTO RICO

90040185

58-12-1

MARCH 19, 1980. $**3,000.00**

OFFICIAL CHECK

PAY TO THE ORDER OF ----------DAVID SAWYER----------

B. P. P. R. POPULAR CENTER 3000 DOLS 00 CTS ---------- DOLLARS

OVER $300.00 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

"90040185"

# BANCO DE SANTANDER - PUERTO RICO

DIRECCION POSTAL:
G.P.O. BOX 2589
SAN JUAN, PUERTO RICO 00936

CABLES: SANBANDER
TELEX: ITT 3480062 BADERPR
ITT 3480031
RCA 3882497
RCA 3282428
WESTERN UNION 3684299

April 11, 1980

To whom may it concern:

I hereby certify that on this date we have credited the Account No. ____ - Kennedy for President in the amount of $6,325.00 for checks deposited as described in Exhibit "A" attached hereto.

Sincerely,

Miguel Morales
Credit Manager

imr/

Para que esta carta sea válida todas sus páginas deberán estar firmadas

0 2 0 4 0 3 3 3 5 1 8

LIC. NO. [illegible]
BOX 972
SAN JUAN, P.R. 00902

8/ 19 80 101-202 / 215

PAY TO THE ORDER OF [illegible] $ 31.00

[illegible] DOLLARS

THE ROYAL BANK OF CANADA
204 TETUÁN STREET
SAN JUAN, PUERTO RICO

FOR [illegible]

⑆021502024⑆

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1347

LUIS O. RODRIGUEZ Y/O
MARIA L. RODRIGUEZ
COND. EL MIRAMAR APTO. 3-A
AVE. MIRAMAR ESQ. OLIMPO-SANTURCE, P.R. 00908

3-10-19 80 101-205 / 215

PAY TO THE ORDER OF Kennedy for President $ 40.00

Cuarenta 00/100 DOLLARS

BANCO de San Juan
SUCURSAL VILLA PALMERAS, AVE. EDUARDO CONDE, SANTURCE, P. R.

FOR [illegible]

⑆021502053⑆

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JULIO MORALES
SAN JORGE NO. 259 -
SANTURCE, P.R. 00912

2273

Nov 11 19 80 101-205 / 215

PAY TO THE ORDER OF Kennedy for President $ 40 00

Cuarenta 00/100 DOLLARS

BANCO de San Juan
SUCURSAL VILLA PALMERAS, AVE. EDUARDO CONDE, SANTURCE, P. R.

FOR [illegible]

⑆021502053⑆

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653

J.H. Y/O MICHELLE MARTIN
G.P.O. BOX 3036
SAN JUAN, P.R. 00936

5/13 19 80 101-204 / 215

Pay to the Order of Comm. Re Kennedy $ 40.00

[illegible] Dollars

CITIBANK
Citibank, N.A. Plaza Las Americas 00918

[illegible]

⑆021502040⑆

6204033335119

FLOR...CE C. MENDEZ
APARTADO 200
REY, P.R. 00919

March 17 1980 101-280/215

Pay to the Order of Kennedy Lei President $ 20.00

Twenty 00/xx Dollars

BANCO COOPERATIVO DE PUERTO RICO
HATO REY, PUERTO RICO

For

⑆021502383⑆

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1801

LCDO. C. ARZUAGA ALGARIN Y/O
AIDA M. ARZUAGA
CALLE 4 NO. 92 VILLAMAR
ISLA VERDE, P.R. 00913

March 10 1980 101-209/215

PAY TO THE ORDER OF Comite Pro Kennedy $ 20 00

Veinte 00/xx DOLLARS

BANCO DE PONCE
ISLA VERDE
CAROLINA, PUERTO RICO

FOR

⑆021502095⑆

---

JUAN H. IBAÑEZ Y/O
CARMEN S. IBAÑEZ

813

Marzo 20 1980 101-205/215

PAY TO THE ORDER OF Comité Kennedy Para Presidente $ 20 00/xx

Veinte Dólares con 00/xx DOLLARS

BANCO de San Juan
SANTURCE, P. R.

FOR

⑆021502053⑆

---

VICTORIA RODRIGUEZ

No. 19

March 17 1980 101-280/215

PAY TO THE ORDER OF Comite Kennedy Pro $ 20. 00

Veinte dólares DOLLARS

Scotiabank de Puerto Rico
1507 Ponce de Leon Avenue
Santurce, Puerto Rico

FOR

⑆021502804⑆

0 2 0 4 0 3 3 3 5 2 0

216 [redacted] RAMIREZ BALDRICH
[redacted] REY, P.R. 00918

3/[redacted] 19 80 101-208/215

PAY TO THE ORDER OF Cash $ 20.00

Twenty 2 00/100 DOLLARS

BANCO DE PONCE
AVENIDA MUÑOZ RIVERA, PARADA 30
HATO REY, PUERTO RICO

FOR Jackie O Juan Luis Bird.

⑆021502095⑆

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MARISARA PONT 1311

13 de marzo 19 80 101-201/215

PAY TO THE ORDER OF Hermanday for President $ 20.00

veinte 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

FOR _____ Marisara Pont

⑆021502011⑆

---

LUZ RAQUEL B. DE PRADO 627

[redacted] 19 80 101-201/215

PAY TO THE ORDER OF Hermandad for President $ 20.00

[redacted] DOLLARS

BANCO POPULAR DE PUERTO RICO
MIRAMAR, PUERTO RICO

FOR _____ [redacted]

⑆021502011⑆

---

RITA SOLA No. 9 21

11 de mayo 19 80 101-201/215

PAY TO THE ORDER OF Hermandad for President $ 20.00

veinte 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

FOR Hermandad [redacted]

⑆021502011⑆

OK

520403335521

10 [illegible] 19 80 101-201/215

PAY TO THE ORDER OF Comité Ted Kennedy $ 20 00

Veinte dólares DOLLARS

BANCO POPULAR DE PUERTO RICO
BANCO POPULAR CENTER BRANCH
SAN JUAN, PUERTO RICO

FOR _____

⑈0215020⑈

---

LCDO. JOSÉ E. FERNÁNDEZ SEIN
Y/O PATRIA DEL CARMEN
FERNÁNDEZ

3266

19 marzo 19 80 101-201/215

PAY TO THE ORDER OF Ted Kennedy for President $ 20 00

— Veinte dólares — DOLLARS

BANCO POPULAR DE PUERTO RICO
MIRAMAR, PUERTO RICO

FOR _____ Patria del C. Fernández

⑈0215020⑈

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JOSE A. PURAS RIVERA

757

3-11 19 80 101-201/215

PAY TO THE ORDER OF KENNEDY FOR PRESIDENT $ 20.00

VEINTE CON NO/C. DOLLARS

BANCO POPULAR DE PUERTO RICO
STOP 15 FERNANDEZ JUNCOS AVE. BRANCH
SANTURCE, PUERTO RICO

FOR _____ [signature]

⑈0215020⑈

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VIRTUDES G. DE SILVA

No. 150

Mayo 11 19 80 101-201/215

PAY TO THE ORDER OF Kennedy for President $ 20 00/100

veinte con 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
MIRAMAR, PUERTO RICO

FOR Virtudes G. de Silva

⑈0215020⑈

OK

⑆220403335222

E. Mayo 19 80 101-201 / 215

PAY TO THE ORDER OF Kennedy for President $ 20.00

Veinte DOLLARS

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

FOR Mercedes Pinto

⑆021502011⑆

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JORGE LUIS VEGA/HILDA PIETRI DE VEGA
CALLE 7, B4-14
ALTURAS DE TORRIMAR
GUAYNABO, P.R. 00657

923

March 10, 1980 101-208 / 215

PAY TO THE ORDER OF Kennedy for President $ 20.00

Twenty and no/100 DOLLARS

THE CHASE MANHATTAN BANK
National Association
Santurce Branch, Santurce, Puerto Rico
6-2

FOR Hilda Pietri de Vega

⑆021502066⑆

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CARLOS GAZTAMBIDE ACOSTA Y/O
ROSITA JANER DE GAZTAMBIDE
CALLE MADRID 316, TORRIMAR 1
GUAYNABO, PUERTO RICO

No. 1186

Marzo 10 1980 101-201 / 215

PAY TO THE ORDER OF Kennedy For President Committee $ 20. 00 / XX

Veinte 00 / XX DOLLARS

BANCO POPULAR DE PUERTO RICO
HYDE PARK BRANCH
RIO PIEDRAS, PUERTO RICO

FOR Rosita Janer de Gaztambide

⑆021502011⑆

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IRMA CAMPILLO

457

[illegible] 19 80 101-201 / 215

PAY TO THE ORDER OF Citizens Kennedy Para Pres. $ 20.00

Veinte and 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
MIRAMAR, PUERTO RICO

FOR

⑆021500201⑆

6204033335523

APARTADO 14208
SANTURCE, P.R. 00916

7- 19 82 101-201/215

PAY TO THE ORDER OF KENNEDY PRESIDENT $ 20.00

Veinte Dolares DOLLARS

BANCO POPULAR DE PUERTO RICO
CONDADO BRANCH
SANTURCE, PUERTO RICO

FOR Banquete con Jaqueline

⑈0215020⑈

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M.P. SERBIA

112

9/11 19 82 101-201/215

PAY TO THE ORDER OF Comite Pro Kennedy Presidente $ 20.00

veinte Dolares con 00/xx DOLLARS

BANCO POPULAR DE PUERTO RICO
CONDADO BRANCH
SANTURCE, PUERTO RICO

FOR Entrada actual fiesta Kennedy

⑈0215020⑈

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MANOLITA APARICIO NORIEGA
APARTADO 9391
SANTURCE, P.R. 00908

219

Marzo 11 19 82 101.205/215

PAY TO THE ORDER OF Kennedy Presidente $ 20.00

veinte 00/100 DOLLARS

BANCO de San Juan
SANTURCE, P. R.

FOR C. Hilton

Manolita Aparicio Noriega

⑆0215020531⑆

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CARMEN MARIA AGRESAR
TELEFONO
P.O. BOX 11620 CAPARRA HEIGHTS STA.
SAN JUAN, P.R. 00922

1047

March 11 19 82 101.202/215

PAY TO THE ORDER OF Kennedy for President $ 20.00

Twenty 00/100 DOLLARS

THE ROYAL BANK OF CANADA
AVE. JOHN F. KENNEDY BRANCH
SAN JUAN, PUERTO RICO

FOR

⑆0215020741⑆

Carmen Maria Agresar

OK

⑆0204033335524

MODE[illegible] ROSADO OR
A[illegible] ROSADO
CALLE [illegible] NO. 1 TORRIMAR
GU[illegible] P.R. 00657

764

101-201
215

0 4 0 3 3 3 5 2 [illegible]

PAY TO THE ORDER OF Cristina Arroyo Kennedy $ 10.00

Diez y 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
LOMAS VERDES AVENUE BRANCH
BAYAMON, PUERTO RICO

FOR _____ Ana Rosado

⑈021502011⑈

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DR. JOSÉ RAÚL AYALA CUERVOS
Y/O LUZ E. RIVERA DE AYALA

1541

Marzo 11 19 80

101-201
215

PAY TO THE ORDER OF Kennedy for President $ 10.00

diez 00/100 DOLLARS

BANCO POPULAR DE PUERTO RICO
PIÑERO AVENUE BRANCH
CAPARRA TERRACE, PUERTO RICO

FOR _____ Luz E. Rivera de Ayala

⑈021502011⑈

Y/O ANA LUISA OHARRIZ RODON

0 2 0 4 0 [redacted] 2 6 — Mayo 2 19 80 — 101-205 / 215

PAY TO THE ORDER OF Sacred Heart Church — $ 10.00

Diez 00/100 DOLLARS

BANCO de San Juan
BAYAMON, P. P.

FOR _____ Luisa M. Suzoni

⑆021502053⑆

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ISABEL M. CESTERO — 191

Marzo 6 19 80 — 101-208 / 215

PAY TO THE ORDER OF Cash — $ 15.00

Quince con 00/100 DOLLARS

THE CHASE MANHATTAN BANK
National Association
Caparra Branch, Caparra, Puerto Rico

FOR _____ Isabel M. Cestero

⑆021502066⑆

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MARIA TERESA G. MATOSANTOS — 1014
CALLE OVIEDO NO. 38
LORRIMAR
GUAYNABO, P.R. 00657

14 marzo 19 80 — 101-201 / 215

PAY TO THE ORDER OF Cash — $ 20 00

Veinte dolares DOLLARS

BANCO POPULAR DE PUERTO RICO
SAN PATRICIO PLAZA BRANCH
SAN JUAN, PUERTO RICO

FOR _____ Maria Teresa G. Matosantos

⑆021502020

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LCDO. RUBÉN RODRÍGUEZ ANTONGIORGI — 385
LUCY M. DE RODRÍGUEZ
G.P.O. BOX 3507
SAN JUAN, P.R. 00936

Marzo 19 80 — 101-206 / 215

PAY TO THE ORDER OF Cash — $ 10.

Diez 00/100 DOLLARS

THE CHASE MANHATTAN BANK
National Association
Hato Rey Branch, Hato Rey, Puerto Rico

FOR _____ Rubén Rodríguez Antongiorgi

⑆021502066⑆

2040333529

## SWORN STATEMENT

I, Julio Héctor Morales, of legal age, married, Administrative Officer of an advertising agency and resident of San Juan, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above mentioned.

2. That I am employed in Lopito, Ileana & Howie, an advertising agency, doing business in San Juan, Puerto Rico.

3. That this agency performed part of the advertising for the Kennedy campaign in Puerto Rico.

4. That we received $168,962.33 of which $88,230.33 were paid in cash for the Kennedy Campaign media expenses.

5. That the Kennedy Campaign in Puerto Rico has completed their debts with our agency.

In San Juan, Puerto Rico, 17 of April, 1980.

Julio Hector Morales

AFFIDDAVIT NO. 2121

Suscribed and sworn to before me by Julio Héctor Morales of the personal circumstances above mentioned.

In San Juan, Puerto Rico, 17 of April, 1980.

LUIS FRANCISCO HERNANDEZ VELEZ
ABOGADO

Notary Public

**SWORN STATEMENT**

I, MIGUEL A. RIVERA, of legal age, lawyer, married and a resident of Guaynabo, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above-mentioned.

2. That during the month of March, 1980 the Kennedy For President Committee organized various fund raising activities.

3. That one of these activities was an island-wide radio marathon. Radio marathons are a customary method of raising funds for political candidates in Puerto Rico. Usually, starting sometime prior to the marathon, various campaign workers will solicit contributions from individuals throughout Puerto Rico. On the day of the marathon all these contributions are brought to a central location. Further on the date of the marathon, contributions are solicited from individuals on the streets.

4. That the amount collected during the island-wide radio marathon for Kennedy for President Committee was $99,230.33 in cash and checks payable in cash for small amounts from individuals.

5. That no contributions in cash was received from any individual that was in excess of $50.00 or in cash checks.

6. That out of the amount raised from the radio marathon, $88,230.33 was paid in cash to Ileana, Lopito and Howie, an advertising agency, for radio and television commercials. Further, $11,000.00 was paid by money order to David Sawyer for film production cost.

7. That the Puerto Rico Kennedy For President Committee had an agreement with the National Committee that funds raised locally would, whenever possible, be returned for the use of the local campaign.

8. That during the final days prior to the Presidential Primary in Puerto Rico, there was not sufficient time to send the locally collected contributions to the National Headquarters in Washington and receive the return of those funds. Further, Ileana, Lopito and Howie and David Sawyer required the Kennedy

For President-Puerto Rico Committee to make deposits and/or pay in advance for all media cost.

9. That in order to have the services of Ileana, Lopito and Howie and David Sawyer, prior to the Presidential Primary in Puerto Rico, it was necessary to make deposits and/or pay in advance for media cost.

In San Juan, Puerto Rico, this 25th day of November, 1980.

Miguel A. Rivera

Affidavit No. 388

Sworn and subscribed to before me by Miguel A. Rivera, of the personal circumstances above stated, to me personally known [illegible] November, 1980 at San Juan, Puerto Rico,

NOTARY PUBLIC

8204033335 30

FIRST CLASS MAIL

80 DEC 4 P1

[redacted]
30 17th STREET, N.W.
ASHINGTON, D.C. 20036

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K St., N.W.
Washington, D.C. 20463

FIRST CLASS MAIL

FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR # 1370

Date Filmed 7-24-82 Camera No. --- 2

Cameraman SDC

KENNEDY
For President
Box 11001 Caparra Heights
San Juan, Puerto Rico 00922

B14

FEC Exhibit One 9611 OC.

14 de febrero de 1980

A QUIEN PUEDA INTERESAR:

Re: Cuenta Número
Kennedy Para Presidente

Por la presente le notifico que como Director de la Campaña del Senador Edward M. Kennedy en Puerto Rico, soy la única persona autorizada para firmar en la cuenta corriente de Kennedy Para Presidente.

De tener cualquier duda en relación a este asunto, no vacile en comunicarse conmigo.

Atentamente,

Miguel D. Lausell
Director de Campaña

8204033535 32

BS PR

# BANCO DE SANTANDER-PUERTO RICO

DIRECCION POSTAL
G.P.O. BOX 2589
SAN JUAN, PUERTO RICO 00936

CABLES: BANSANDER
TELEX: ITT 3450062 BADEPR
ITT 3450031
RCA 3859487
RCA 3282420
WESTERN UNION 3854299

April 11, 1980

To whom may it concern:

I hereby certify that on this date we have credited the Account No. [redacted] -Kennedy for President in the amount of $6,325.00 for checks deposited as described in Exhibit "A" attached hereto.

Sincerely,

Miguel Morales
Credit Manager

imr/

8 2 0 4 0 3 3 3 5 3 3

Para que esta carta sea válida todas sus páginas deberán estar firmadas

820 403 534

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040184

53-12-1

MARCH 19, 1930. $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

POPULAR CODE 3000 DOLS 00 CTS DOLLARS

OVER $999.99 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040184⑈ ⑆026O-088⑆

OFFICIAL CHECK

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040185

58-12-1

MARCH 19, 1930. $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAWYER----------

POPULAR CODE 3000 DOLS 00 CTS DOLLARS

OVER $999.99 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040185⑈ ⑆026O-088⑆

820403.3 535

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040183

58-12-1

MARCH 12 1980 $**3,000.00**

OFFICIAL CHECK

PAY TO THE ORDER OF ----------DAVID SANTOS----------

B. P. P. R. POPULAR CENTER 3000 DOLS 00 CTS DOLLARS

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040183⑈ ⑆0260-0884⑆

BANCO POPULAR DE PUERTO RICO
SAN JUAN, PUERTO RICO

90040186

58-12-1

MARCH 12 1980 $**2,000.00**

OFFICIAL CHECK

PAY TO THE ORDER OF ----------DAVID SANTOS----------

B. P. P. R. POPULAR CENTER 2000 DOLS 00 CTS DOLLARS

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040186⑈ ⑆0260-0884⑆

(0 2 0 4 0 3 3 3 5 3 6 FEC Exhibit 2 (28 pages)

SWORN STATEMENT

I, MIGUEL D. LAUSELL, of legal age, married, a lawyer and a resident of Guaynabo, Puerto Rico, as Campaign Director of the Kennedy for President Committee in Puerto Rico, do hereby swear:

1. That my personal circumstances are the above-mentioned.

2. That during the months of February, March, April and June, 1980 deposits were locally made into the Kennedy for President-Puerto Rico account.

3. A checking account was opened for the Kennedy for President-Puerto Rico on June 18, 1980 at Banco de Santander-Puerto Rico San Juan, Puerto Rico.

4. That during the course of the campaign numbers of small cash contributions were received by the Kennedy For President Committee in Puerto Rico.

5. That none of these contributions from individuals exceeded $50.00 in cash.

6. That in many instances, contributions were made by checks accompanied by signature cards.

7. That during the campaign it was necessary to deposit some of these contributions in our account at Banco de Santander-Puerto Rico.

8. That during the month of February two deposits were made, the first for $4,000.00 and the second for $2,000.00.

9. That during March, 1980 a deposit in the amount of $20.00 was made.

10. That during April, 1980 a deposit in the amount of $6,325.00 was made. (See attachment A)

11. That during June, 1980 a deposit in the amount of $365.00 was made. (See attachment B)

In San Juan, Puerto Rico, this 25th day of November, 1980.

Affidavit Number 387

MIGUEL D. LAUSELL

Sworn to and subscribed before me by Miguel D. Lausell, of the personal circumstances above-mentioned, to me personally known at San Juan, Puerto Rico this 25th day of November, 1980.

NOTARY PUBLIC

PEDRO RONET ESPINA ★ Isla de Puerto Rico ★ ABOGADO NOTARIO

FEC Exhibit 2. 5-5-81 O.G.

820 4033337

DEPOSITADO CON — DEPOSITED WITH

BANCO DE SAVANDER PUERTO RICO

PARA ACREDITARSE A
FOR ACCOUNT OF

LA CUENTA PERTENECE A
ACCOUNT IS CARRIED AT

NUMERO DE CUENTA ACCOUNT NUMBER

Al endosar sus cheques incluya su número de cuenta. Endorse your checks including your account number.

EFECTIVO CASH

DETALLE LOS CHEQUES LIST CHECKS

1 2 3 4 5 6 7 8

TOTAL $

CUSTOMER'S COPY

DEPOSITADO CON
DEPOSITED WITH

BS PR BANCO DE SANTANDER
PUERTO RICO

Estas cláusulas se aceptan sujeto a todos los términos y condiciones de este Banco en vigencia en el momento de esta depositación.
These deposits are accepted subject to all the terms and conditions of this Bank now in force at the time deposit is accepted.

Para depósitos recibidos después de cierre del banco, serán depositados en el próximo día laborable.
Deposits received after bank closing will be credited on the next business day.

PARA ACREDITAR A
FOR ACCOUNT OF

LA CUENTA PERTENECE A
ACCOUNT IS CARRIED AT

NUMERO DE CUENTA - ACCOUNT NUMBER

Al endosar sus cheques incluya su número de cuenta. Endorse your checks including your account number

CUSTOMER'S

| | EFECTIVO CASH | DOLLARS | CENTS |
|---|---|---|---|
| 1 | | 36 | |
| 2 | | 12 | |
| 3 | | 15 | |
| 4 | | | |
| 5 | | | |
| 6 | | | |
| 7 | | | |
| 8 | | | |
| TOTAL | | 265 | |

6/21 19

0 2 0 4 1 3 3 5

SENTANDER · PUERTO RICO
JELLER
NO. 4
JUN 13 1980
KEND EST

820403339

Desiderio
Dance Shirtwaders

127.06
108.80
19.06

# Kennedy '80

1250 22nd Street N.W.
Washington, D.C. 20037
202-861-6000

June 18, 1980

Banco De Santander
GPO Box 2589
San Juan, Puerto Rico 00936

FEC Exhibit 4
6-5-81
O.G.

Attention: Rosaura Morales

Dear Ms. Rosaura:

This is to confirm the telephone conversation between yourself and Raquel Frankel on June 18, 1980 regarding account # [redacted] (Kennedy For President-P.R.)

It is our request that, effective immediately, you accept no more deposits to; and honor no more checks drawn on our account at your bank.

Micheal Hill, Regional State Accounts Coordinator for our campaign, will contact you furter regarding any additional steps that may be neccessary to close out our account. If you have any questions about this or any other manner regarding our account, please contact him at our national headquarters:

Kennedy for President Committee
1250 22nd Street, N.W.
Washington, D.C. 20037
(202) 861-6032

Thank you for your cooperation.

Sincerely,

William C. Oldaker
Treasurer

B.S.P.R.
HATO REY
FUNCIONES
JUN 2

0 2 0 4 0 3 3 3 5 4 0

A copy of our report is filed with the Federal Election Co[mmission] and is available for purchase from the Federal Election Commission, Washington, D.C. 20463

FEC Exhibit 5a

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-726

# invoice

FEC Exhibit 5B thru 5-5-80 DG

NO. 2800012

DATE 2-1-80

CLIENT Comite Kennedy Presidente

JOB Producciones y Anuncios - Radio y Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| ALBERTO CARRION<br>JINGLE - KENNEDY | | | $ 5,800.00 |
| OCHOA RECORDING - Cassettes & cartridges 28941, 28985 | | | 736.00 |
| ANUNCIO PRENSA<br>Produccion y Publicacion | | | 353.00 |
| PRODUCCIONES LAYOUT, MECHANICAL COPIES LETTERING, PHOTOSTATS BROCHURE | | | 788.00 |
| ELMENDORF - PRINTING BROCHURE 10,000 OCPIES | | | 3,500.00 |
| CAMPAÑA RADIO<br>FEB 4 A FEB 9 | | | 5,999.00 |
| | | | 17,176.00 |
| Menos pago parcial | | | 5,000.00 |
| Balance de esta factura | | | $ 12,176.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

MEDIA

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 800015

DATE Febrero 8, 1980

CLIENT COmite Kennedy Presidente

JOB Produccion y Publicacion Anuncio Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Arte, Tipografia, mechanical, y publicacion Anuncio en el Mundo y el San Juan Star | | | 1,266.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

FILED

5c

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800001

DATE 2-21-80

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Feb. 22 a Feb. 29/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WQBS - 2 - 30" "Show de la Mañana" | | $ 420.00 | |
| WZNT-FM 7 30" "Lunes a Sabado | | $1,624.00 | |
| WIIQ 5 30" "Lunes a Viernes" | | 810.00 | |
| WAPA 2- 30" "Show de la Mañana | | 192.00 | |
| WLUZ 2 30" "Alegre Despertar y Hoy | | 480.00 | |
| WUNO 2- 30" "Ultima Hora" | | 432.00 | |
| WKVM 2 -30" "Show de la Mañana" | | 288.00 | |
| WBMJ - 5 30" "Lunes a Domingo | | 1,400.00 | |
| WZAR 5- 30" "Lunes a Viernes" | | 360.00 | |
| WPRP 5- 30" "Lunes a Domingo | | 240.00 | |
| COSMO - 5- 30" Lunes a Domingo | | 240.00 | |
| WAEL 5- 30" Lunes a Viernes | | 135.00 | |
| WALO - 5-30" Lunes a Viernes | | 150.00 | |
| WMIA - 5 30" Lunes a Domingo | | 116.00 | |
| WCMN 5 30" Lunes a Viernes | | 120.00 | |
| WUPR 5 30" Lunes a Viernes | | 120.00 | |
| WVJP 5 30" Lunes a Viernes | | 120.00 | |
| WNEL 5 30" Lunes a Viernes | | 180.00 | |
| WKAQ 4 30" Radio Reloj - Combo | | 1,579.00 | |
| WMDD 5 30" Lunes a Domingo | | 240.00 | |
| | | | $9,246.00 |

8 2 0 4 0 3 3 5 4 3

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

5d

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 280007

DATE 2/22/80

CLIENT Comite Ke-nedy Presidente

JOB Cargos Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| OCHOA RECORDING STUDIOS | | | |
| (1 tape) #29046 | | $ 11.00 | |
| (2 tape) #28992 | | 20.00 | |
| (25 " ) #29137 | | 250.00 | |
| (20 " ) #29165 | | 200.00 | |
| | | | $481.00 |

820405 33544

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800008

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios - televisión - Feb. 27 a Marzo 4, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ-TV | | | |
| 4-30" - Feb. 27 | | | |
| 2-30" - Feb. 28 | | | |
| 2-30" - Feb. 29 | | | |
| 1-30" - Marzo 1 | | | |
| 3-30" - Marzo 2 | | | |
| 3-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | $6,750.00 | |
| WAPA-TV | | | |
| 3-30" - Feb. 27 | | | |
| 4-30" - Feb. 28 | | | |
| 3-30" - Feb. 29 | | | |
| 1-30" - Marzo 2 | | | |
| 2-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | 5,165.00 | |
| II. WKBM-TV | | | |
| 1-30" - Feb. 28 | | | |
| 1-30" - Feb. 29 | | | |
| 1-30" - marzo 3 | | | |
| 1-30" - Marzo 4 | | 1,000.00 | |
| | | | $12,915.0 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800009

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios Radio - Marzo 3 a Marzo 7, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - Radio<br>4-30" Radio Reloj | | $1,220.00 | $1,220.00 |

820403 35546

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

59

# invoice

NO. 380011

DATE

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA RADIO MARZO 12/ MARZO 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ - 32 spots 30ss Radio Reloj | | $3,300.00 | |
| 2. WQBS - 91 " " | | 1,274.00 | |
| 3. WZNT - 77 " " | | 1,582.00 | |
| 4. WQII - 51 " " | | 1,056.00 | |
| 5. WAPA - 24 " " | | 384.00 | |
| 6. WUNO - 32 " " | | 1,152.00 | |
| 7. WKVM - 12 " " | | 288.00 | |
| 8. WBMJ - 40 " " | | 1,400.00 | |
| 9. WFID - 30 " " | | 420.00 | |
| 10. WIAC - 16 " " | | 288.00 | |
| 11. WZAR - 42 " " | | 504.00 | |
| 12. WPRP - 42 " " | | 294.00 | |
| 13. WOYE - 42 " " | | 252.00 | |
| 14. WAEL - 42 " " | | 189.00 | |
| 15. WMDD - 42 " " | | 336.00 | |
| 16. WALO - 42 " " | | 210.00 | |
| 17. WMIA - 42 " " | | 121.80 | |
| 18. WORO - 42 " " | | 417.90 | |
| 19. WCMN - 42 " " | | 168.00 | |
| 20. WUPR - 42 " " | | 168.00 | |
| 21. WVJP - 42 " " | | 168.00 | |
| 22. WNEL - 42 " " | | 252.00 | |
| 23. WPRM - 42 " " | | 504.00 | |
| 24. WXRF - 42 " " | | 252.00 | |
| 25. WHOY - 42 " " | | 168.00 | |
| 26. WXEW - 42 " " | | 126.00 | |
| 27. WENA - 42 " " | | 189.00 | |
| 28. WX100- 45 " " | | 450.00 | |
| 29. WLUZ - 30 " " | | 540.00 | |
| | | | $16,453.70 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO TELEVISION MARZO 5 A MARZO 11/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV | | | |
| 1-30ss Marzo 5 | | | |
| 2-30ss Marzo 6 | | | |
| 3-30ss " 3 | | | |
| 1-30ss " 8 | | | |
| 2-30ss " 9 | | | |
| 4-30ss " 10 | | | |
| 3-30ss " 11 | | $8,775.00 | |
| II. WAPA - TV | | | |
| 1-30ss Marzo 5 | | | |
| 3-30ss " 6 | | | |
| 2-30ss " 7 | | | |
| 1-30ss " 9 | | | |
| 2-30ss " 10 | | | |
| 2-30ss " 11 | | 4,800.00 | |
| III. WKBM - TV | | | |
| 1-30ss Marzo 2 | | 200.00 | |
| | | | $13,775.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800003

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB PRODUCCION ANUNCIO RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO 30SS - 2 SPOTS | | | |
| EJECUTORES, ESTUDIO, MEZCLA Y SUPERVISION | | 469.72 | |
| 5 CARTRIDGES | | 500.00 | |
| | | | 969.72 |
| OCHOA RECORDING | 29184 | | 46.00 |
| | | | 1,015.72 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800004

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS RADIO Y TELEVISION

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV<br>2 30" MARZO 7 y 14 | | 1,000.00 | |
| II. WKAQ - RADIO<br>44 - 30" MARZO 7, 10 y 11 | | 2,248.00 | |
| | | | $3,248.00 |

8204035350

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380004-A

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB PRODUCCION - RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO<br>30SS - 2 - SPOTS<br>LOCUTORES, ESTUDIO, MEZCLA, MASTER,<br>DEMO Y SUPERVISION. | | 1,030.25 | |
| 75 CARTRIDGES | | 750.00 | |
| | | | $1,780.25 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380008

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB TELEVISION MARZO 8 A MARZO 15 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ -- TV<br>1 - 30" Marzo 8<br>1 - 30" " 10<br>3 - 30" " 12 | | $2,575.00 | |
| WAPA - TV<br>4 - 30" Marzo 8<br>2 - 30" " 9<br>1 - 30" " 10<br>2 - 30" " 11<br>2 - 30" " 13<br>4 - 30" " 15 | | $6,145.00 | $8,720.00 |

8204033552

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380009

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TV MARZO 9 A MARZO 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKBM - TV | | | |
| 2-30" Marzo 9 | | | |
| 1-30" " 10 | | | |
| 1-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | $2,800.00 | |
| II. WLUZ - TV | | | |
| 1-30" Marzo 9 | | | |
| 3-30" " 10 | | | |
| 2-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | 2,025.00 | |
| | | | $4,825.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800010

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA - MARZO 13/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. EL MUNDO<br>MARZO 13 - 14"x5c | | $1,470.00 | |
| II. EL NUEVO DIA<br>MARZO 13, - 14 x 5c | | 1,105.00 | |
| III. SAN JUAN STAR<br>MARZO 13 - 14x6c | | 1,411.20 | |
| IV. EL VOCERO<br>MARZO 13 - 13 5c | | 975.00 | $4,961.20 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3780013

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 12 AL 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WAPA-TV<br>MARZO 12 - 4 spots 30ss<br>MARZO 13 - 3 spots 30ss<br>MARZO 14 - 4 spots 30ss | | | $3,715.00 |

8204035555

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380014

DATE 3-15-82

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOUS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 2VTR COPIES WLUZ | | 117.65 | |
| 2. ENTREGAS DE CARTRIDGES EN RADIO EMISORAS AREA METROPOLITANA E ISLA | | 100.00 | $217.65 |

8204063556

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7280.

# invoice NO. 3800015

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13 AL 3-15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3 - 30 Marzo 12<br>2 - 30 Marzo 13<br>1 - 15 Marzo 15 | | | $2,450.00 |
| WKAQ - TV<br>2 - 30 Marzo 13<br>3 - 30 Marzo 14<br>2 - 30 Marzo 15 | | | 2,800.00 |
| WAPA - TV<br>4 - 30 Marzo 13<br>1 - 30 Marzo 14<br>3 - 30 Marzo 15 | | | 3,440.00 |
| | | | $8,690.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380016

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - TV<br>2 - 30" Marzo 12<br>4 - 30" Marzo 13<br>3 - 30" Marzo 14<br>1 - 30" Marzo 15 | | | $1,090.00 |
| WKMB - TV<br>1 - 30" Marzo 13 | | | 300.00 |
| WKBM TV<br>2-30" Marzo 12<br>3-20" Marzo 13<br>4-30" Marzo 14<br>4-30" Marzo 15 | | | 3,685.00 |
| | | | $5,075.00 |

8204035358

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380017

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15-80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WAPA-TV<br><br>7 - 30ss Marzo 12<br>10- 30ss Marzo 13<br>13- 30ss Marzo 14<br>6 - 30ss Marzo 15 | | | $14,095.00 |

8204073559

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380018

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO - 16 | | $1,365.00 | |
| EL MUNDO<br>14" x 5c MARZO 16 | | 1,470.00 | |
| SAN JUAN STAR<br>13 1/x x 6c MARZO 16 | | 1,411.20 | |
| EL VOCERO<br>13" x 5c MARZO 14 (2)<br>13" x 5c MARZO 15 (2) | | 2,080.00<br>2,080.00 | $8,406.20 |

8204063560

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800019

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| REPARTIR CARTRIDGES A RADIO EMISORAS DEL AREA METROPOLITANA Y FUERA DEL AREA. | | $100.00 | |
| VIAR COMUNICADOS PRENSA MENSAJERO ESPECIAL. | | 50.00 | $150.00 |

8204033561

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 380020

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA - RADIO MARATON

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL MUNDO<br>6" x 3c Marzo 14 y 15 | | $612.00 | |
| EL NUEVO DIA<br>6" x 3 c MARZO 14 y 15 | | 612.00 | |
| EL VOCERO<br>6" x 3 c MARZO 14 y 15 | | 540.00 | $1,764.00 |

8204033562

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380021

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13-y 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| COMITE KENNEDY PRESIDENTE: | | | |
| WAPA - TV<br>5 - 30 ss Marzo 13<br>3 - 30 ss Marzo 14<br>1 - 30 ss Marzo 15 | | | $3,000.00 |

d 2040 3356

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380022

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA MARZO 15/80 DOBLE VOTO

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO 15 | | | $1,332.50 |
| EL MUNDO<br>14" x 5 c MARZO 15 | | | 1,505.00 |
| | | | $2,837.50 |

8204037335564

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

54

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3780023

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 13 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3- 30ss MARZO 13 | | | $1,300.00 |

0 2 0 4 0 3 3 5 6 5

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800024

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Marzo 14 y 16

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ-Radio<br>16 spots - 30ss | | $ 976.00 | |
| 2. WKAQ-FM<br>45 spots - 30ss | | 390.00 | |
| | | | $=1,366.00 |

820403566

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

5aa

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800025

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Programa Radial en Cadena - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WABA-Aguadilla | | $ 50.00 | |
| 2. WZAR-Ponce | | 150.00 | |
| 3. WKFE-Yauco | | 80.00 | |
| 4. WNIK-Arecibo | | 40.00 | |
| 5. WKVM-San Juan | | 200.00 | |
| 6. WVJP-Caguas | | 55.00 | |
| 7. WXRF-Guayama | | 96.00 | |
| 8. WEKO-Cabo Rojo | | 70.00 | |
| 9. WEGA-Vega Baja | | 55.00 | |
| 10. WOYE-Mayaguez | | 100.00 | |
| 11. WFBA-San Sebastian | | 60.00 | |
| 12. WMDD-Fajardo | | 100.00 | |
| 13. WLEY-Cayey | | 80.00 | |
| | | | $ 1,136.00 |

0204033567

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

566

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 380026

DATE 15 de marzo /80

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - Mayo 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 'El Día | | | |
| 6" x 3 c - marzo 15 | | $ 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 2. El Mundo | | | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 3. El Vocero | | | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| | | | $ 1,764.00 |

8204033568

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380027

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. El Mundo<br>14" x 11 c - marzo 16 (C.S.) | | $ 2,618.00, | |
| 2. El Mundo<br>14" x 5 c - marzo 16 | | 1,470.00 | |
| 3. El Mundo<br>14" x 5 c - marzo 16 | | 1,190.00 | |
| 4. El Nuevo Día<br>13" x 5 c - marzo 16 | | 1,105.00 | |
| | | | $ 6,383.00 |

820405 35369

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800028

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Entrega cartridges área metropolitana e interior de la isla - Jueves 13 y Viernes 14 (entregado por mensajero especial después de las 7:00 pm.) | | $250.00 | $250.00 |

8204035370

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 718, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800029

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 3 spots Radio - marzo 12/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutores, estudio, mezcla cartridges, supervisión. | | $ 1,159.17 | $ 1,159.17 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

54

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 0090/ Tel. 724-7260.

# invoice

NO. 380030

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 2 spots radio

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutor, estudio, mezcla cartridges, supervisión. | | $ 594.86 | $ 594.86 |

0204035572

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800031

DATE 17 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Programa de(1/2)media hora<br>6:30 a 7:00 pm.<br>Mensaje Rafael Hernández Colón<br>sobre las Primarias y Robert<br>Kennedy, Jr. | | $ 2,000.00 | $2,000.00 |

8204053573

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

5th

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7280.

# invoice

NO. 3800032

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Grabación - Programa Hernández Colón /Kennedy

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - Grabación VTR para usarse en programa 30 minutos en WAPA. | | $1,000.00 | |
| | | | $1,000.00 |

8204033574

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800033

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Mensaje Hernández Colón - WAPA - TV

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ-TV - 2 horas adicionales de edición y 1/2 hora grabación mensaje Rafael Hernández Colón marzo 14, 1980 | | 426.48 | $426.48 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

5 jj

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380003

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 5 spots - 30ss

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción 5 spots radio 30ss, locutores, estudio, mezcla, supervisión y 24 cartridges. | | 1,379.00 | $1,379.00 |

820403576

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

SKK

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800035

DATE 3-17-80

CLIENT Comité Kennedy Presidente

JOB Producción serie de anuncio para prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción serie de anuncios para la prensa y fotograbados. | | | $5,170.60 |

I 8204035 7

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

511

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

8 2 0 4 0 3 3 5 5

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | Ck # 2 | (5,000.00) |
| | | Ck # 17 | (1,266.00) |
| | | Ck # 1A | (12,176.00) |
| | | | 150,520.33 |
| | | Ck # 2A | (23,790.00) |
| | | | 126,730.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 1E | 5 000.00 |
| | | # 17 | 1 266.00 |
| | | # 1A | 12,176.00 |
| | | # 2A | 23,746.00 |
| | | # 5A | 10,000.00 |
| | | | 116,730.33 |
| | | ck # 8A | (12,000.00) |
| We certify that this amount is correct and has been paid in full. | | | 104,730.33 |
| | | ck # 4A | 4,000.00 |
| | | | 100,730.33 |

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | | ck # 12 | (5000.00) |
| | | ck # 17 | (1266.00) |
| | | ck # 1A | (12176.00) |
| | | ck # 2A | (23,790.00) |
| | | ck # 5A | (10,000.00) |
| | | | 116,730.33 |
| | | ck # 6A | (4 000.00) |
| We certify that this amount is correct and has been paid in full. | | | 112,730.33 |

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

5 pp

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5000.00) |
| | | ck # 17 | (1,266,00) |
| | | ck # 1A | (12,176.00) |
| | | ck # 2A | (23,790.00) |
| | | | 126,730.33 |
| | | ck # 3A | (10,000.00) |
| | | | 116,730.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julia Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

599

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, Deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5 000.00) |
| | | ck # 17 | (1 266.00) |
| | | | 162,696.33 |
| | | ck # 1H | (12, 176.00) |
| | | Balance | 150,520.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | -(5 000.00) |
| | | | 163,962.33 |
| | | ck # 17 | (1 266.00) |
| | | Balance | 162,696.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | | cl # 12 · Payment | (5000.00) |
| | | Balance | 163,962.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

FEC Exhibit 6

# Kennedy for President Committee

**CHECK REQUEST** — **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED

☐ VENDOR BILL TO FOLLOW

DATE 5/1/80

VENDOR NAME: Lipsitz, Green & Howe, P.C.

VENDOR ADDRESS: Concordia 116

CITY, STATE, ZIP: Miramar, Fla.

AMOUNT DUE: 12,500.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on Invoice

See attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 16A

DATE: 3-12-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

FEC Exhibit 6. 5581 0.6.

Total 165, 962.33

Payments:

| | | |
|---|---|---|
| CL # 12) | 5, | 000.00 |
| 17) | 1, | 246.00 |
| 1H) | 12, | 176.00 |
| 2H) | 28, | 790.00 |
| 5H) | 10, | 000.00 |
| 6H) | 4, | 000.00 |
| 9H) | 12 | 000.00 |
| 16A) | 12, | 500.00 |

85, 230.33 Balance paid in cash

# Kennedy for President Committee

CHECK REQUEST — VENDOR PAYMENT

☐ VENDOR BILL ATTACHED — DATE 5/1/80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Light, Pilgrim & Heeter, P.A.

VENDOR ADDRESS: Executive Plz

CITY, STATE, ZIP: Miramar, FL 33027

AMOUNT DUE: $22,000.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on balance

See attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 2A

DATE: 2-20-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

# Kennedy for President Committee

CHECK REQUEST — VENDOR PAYMENT

☐ VENDOR BILL ATTACHED — DATE 5-1-80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Loyola Hilma S. Henry, Atty.

VENDOR ADDRESS: Evanston 716

CITY, STATE, ZIP: Evanston, IL 60201

AMOUNT DUE: $12000.00

STATE (in which services are rendered):

PARTICULARS (include dates and events) Payment on Retainer for Legal Services

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 8 A

DATE: 5-7-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 5/1/80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Legal Research Assoc., Inc.

VENDOR ADDRESS: Executive 716

CITY, STATE, ZIP: Manassas, VA 22110

AMOUNT DUE: $10,000.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on balance

See attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 517

DATE: 5-28-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Originator — P
Payee — G

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 3/1/80

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Segal, Akerman & Howie P.C.

VENDOR ADDRESS: Executive 716

CITY, STATE, ZIP: Rockville, Md. 20852

AMOUNT DUE: $12,176.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on invoice

See attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 1A

DATE: 2-20-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

# Kennedy for President Committee

CHECK REQUEST — VENDOR PAYMENT

☐ VENDOR BILL ATTACHED — DATE 5/1/60

☒ VENDOR BILL TO FOLLOW

VENDOR NAME: Tyler, Ohman & Mercer, Inc.

VENDOR ADDRESS: Canandaigua, N.Y.

CITY, STATE, ZIP: Manhattan, N.Y. 10967

AMOUNT DUE: $1266.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on Invoice see attached

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 17

DATE:

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

# Kennedy for President Committee

**CHECK REQUEST** — **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED

☐ VENDOR BILL TO FOLLOW

DATE 5-1-80

VENDOR NAME: Lopata, Libman and Hess

VENDOR ADDRESS: Cinnaminson # 716

CITY, STATE, ZIP: Mimmie, PA 08107

AMOUNT DUE: $5,000.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on $168,062.33 (See attached)

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

APPROVAL:

NOTES:

CHECK NUMBER: 12

DATE: 1-24-80

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |
| | | | |
| | | | |
| | | | |
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

# Kennedy for President Committee

**CHECK REQUEST** **VENDOR PAYMENT**

☐ VENDOR BILL ATTACHED DATE 3/1/84

☐ VENDOR BILL TO FOLLOW

VENDOR NAME: Lepetit, Liana A. Grace, Inc.

VENDOR ADDRESS: Cirecitas 116

CITY, STATE, ZIP: Marana, AZ 85653

AMOUNT DUE: $45.00.00

STATE (in which services are rendered)

PARTICULARS (include dates and events) Payment on balance (see attached)

BUDGET CHARGED:

APPROVAL:

SPECIAL HANDLING:

---

APPROVAL:

NOTES:

CHECK NUMBER: 64

DATE: 3-4-84

| AMOUNT | CODE | AMOUNT | CODE |
|---|---|---|---|
| | | | |

Outstanding — W
Alpha File — Y
Orignator — P
Payee — G

DHS FILMS, INC. 60 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

2/27/80

Miguel Lausel
Comite pro Kennedy
Ave. Roosevelt
244 Hato Rey
Puerto Rico 00918

Invoice # 986

Jeddu Mascoretto as line producer and director-writer of the
Radio and TV spots - Kennedy Single and Tradition.....$3,500.00

8204033595

DHS FILMS, INC. 80 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

Mr. Michael Hill
State Accounts Coordinator
Kennedy For President Committee
1250 22nd N.W.
Washington D.C. 20037

Dear Mr. Hill,

Enclosed please find invoices for Kennedy in Puerto Rico:

| | |
|---|---|
| #985 - $ | 22,507.11 |
| #986 - $ | 3,500.00 |
| Total | 26,007.11 |

To date we have received 11,000.00
Balance due: 15,007.11

Very Truly Yours,

Roz Schlesinger

6204035596

OFFICIAL CHECK

**BANCO POPULAR DE PUERTO RICO**
SAN JUAN, PUERTO RICO

1-221
260

90040183

58-12-1

MARCH 12 1980 $**3,000.00**

PAY TO THE ORDER OF DAVID SAWYER

B.P.P.R. POPULAR CENTER 3000 DOLLARS 00 CTS DOLLARS

OVER $500 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040183⑈ ⑆0260-0881⑆ 90-90003-0⑈

OFFICIAL CHECK

**BANCO POPULAR DE PUERTO RICO**
SAN JUAN, PUERTO RICO

1-221
260

90040186

58-12-1

MARCH 12 1980 $**2,000.00**

PAY TO THE ORDER OF DAVID SAWYER

B.P.P.R. POPULAR CENTER 2000 DOLLARS 00 CTS DOLLARS

OVER $500 TWO SIGNATURES REQUIRED

AUTHORIZED SIGNATURE

COUNTERSIGNATURE

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040186⑈ ⑆0260-0881⑆ 90-90003-0⑈

8 2 0 4 0 3 3 3 5 9 7

PENCAD Services, N.J.

FEC Exhibit 7
5-581-06

OFFICIAL CHECK

## BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

90040184

53-12-1

MARCH 19,1930. $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAINER----------

B.P.P.R. POPULAR CENTER 3000 DOLS 00 CTS DOLLARS

OVER $500.00 TWO SIGNATURES REQUIRED

Aaron H. Aller 10-31

AUTHORIZED SIGNATURE

Marcia Cohen Sauer

COUNTERSIGNATURE D-1

BANCO POPULAR DE PUERTO RICO
7 WEST 51ST STREET
NEW YORK, N.Y.

⑈90040184⑈ ⑆026008881⑆ 90-90003-0⑈

OFFICIAL CHECK

## BANCO POPULAR DE PUERTO RICO

SAN JUAN, PUERTO RICO

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MARCH 19,1930. $**3,000.00**

PAY TO THE ORDER OF ----------DAVID SAINER----------

B.P.P.R. POPULAR CENTER 3000 DOLS 00 CTS DOLLARS

OVER $500.00 TWO SIGNATURES REQUIRED

Aaron H. Aller 10-31

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Marcia Cohen Sauer

COUNTERSIGNATURE D-1

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FEC EXHIBIT 8. 5581 0.6.

DHS FILMS, INC. 60 west 55th street, new york, n. y. 10019 (212) 245-0047 cable: cineplay

2/27/80

Miguel Lausel
Comite pro Kennedy
Avenida Roosevelt
244 Hato Rey
Puerto Rico 00918

Invoice # 985

9204035599

Production of Two Radio and Two Television Spots

| | | | |
|---|---|---|---|
| Cameraman | @ $500.00 p.d. | $ | 1,500.00 |
| Assistant Cameraman | @ 190.00 p.d. | | 490.00 |
| Rawstock & Labs | | | 1,322.70 |
| Equipment | | | 700.50 |
| Travel & Subsistence - including Mascoretta & Sawyer | | | 3,744.20 |
| Narration Recording and Dupes | | | 300.00 |
| Sprint Telephone & Messengers | | | 300.00 |
| Editing | | | 2,475.00 |
| Finishing | | | 283.00 |
| Art Work | | | 250.00 |
| Video Transfer & Assembly | | | 2,260.00 |
| Video Dupes | | | 140.00 |
| Stock Footage | | | 1,200.00 |
| Narrator | | | 600.00 |
| Production Manager | | | 750.00 |
| David Sawyer | | | 2,400.00 |
| Insurance | | | 856.00 |
| | Sub Total | | 19,571.40 |
| | 15% Overhead | | 2,935.71 |
| | Total | $ | 22,507.11 |

[redacted]

[redacted]

For the Federal Election Committee

WILLIAM C. OLMER, ESQ.
Suite 1200
1850 Seventeenth Street N.W.
Washington, D.C. 20[illegible]

For Deponent

[redacted]

Notary Public

Pursuant to Stipulation

Interpreter

* * *

[illegible] last on

[illegible]

[illegible] the record, [illegible]

[illegible] by the parties that the notary [illegible] in the proceedings.

It was also stipulated that upon receipt of the original transcript of this deposition, the notary will notify Mr. Lowell that he has it in his office, and he will have a week to come to my office to read the same and make corrections if the same.

And copies will be forwarded to both parties at the same time, so the Government can make corrections if they wish, or the attorney for Mr. Lowell.

Any other stipulations as to questions; objections?

MR. OLDAKER: Corrections made by the Government or by myself should be forwarded to you, so that the objections can be made on the original transcript?

THE NOTARY: I don't understand?

MR. OLDAKER: Well, if I have corrections, I should forward them to you?

[redacted]

MS. GENTNER: For the record, [redacted] is waiving signature? Is that correct?

MR. OLDAKER: Technically, in this [redacted] doesn't really matter, since he is going to review it and make all the changes.

So, I don't think it really matters whether we waive signature at this time or not. I would think that there is no real purpose for waiving signature.

THE NOTARY: Off the record.

(Off the record discussion.)

THE NOTARY: Anything as to objections? Any stipulations for the record?

MR. OLDAKER: We can enter into the ordinary stipulations as to objections.

THE NOTARY: They will be reserved?

MS. GENTNER: Waive the objections, except as to the form of the question?

[redacted]

MIGUEL LAUSELL

[redacted] first duly sworn to state the truth, the whole truth and nothing but the truth, testified upon his oath, as hereinafter, as follows:

DIRECT EXAMINATION

BY MR. [redacted]:

Q Would you state your name, please.

A Miguel D. Lausell.

Q And your employment?

A I am a lawyer.

Q Where are you employed?

A I have my own office.

Q What is your address?

A Tanca Street, corner of Tetuan, San Juan, Puerto Rico.

Q Do you know of a group called the Kennedy

A [redacted]

Q [redacted]

A [redacted]

Q [redacted]

A [redacted]

Q [redacted]

A [redacted]

Well,--

A The Committee that--

Q The Puerto Rican--

A The Puerto Rican committee that carried the [redacted]?

Q Right.

A Yes. We were basically the last committee to be recognized, and that was approximately towards the end of October or the beginning of November.

Q What year?

A 1980, I think it was.

MR. OLDAKER: I think--

THE DEPONENT: '79.

THE INTERPRETER: '79.

[illegible]

[illegible]

MR. [illegible]: [illegible]

MR. [illegible]: [illegible]

MR. [illegible]: On a [illegible]

MR. [illegible]: Appreciate [illegible]

THE REPORTER: [illegible]

MR. [illegible]: Yes.

THE DEPONENT: This was the first time in the political history of Puerto Rico [illegible] were holding presidential primaries.

In this particular instance, Mr. Richstern, together with Mr. Richard Milman came to Puerto Rico to notify us that they were choosing Doctor Victor Gutierrez as president of the committee, and that I would be chosen as campaign director.

The committee, itself, had a president and a campaign director. The president was the highest official. The campaign director, basically, dealt with the political aspects; political organizations and so forth.

[redacted]

[redacted]

[redacted]

[redacted] Kennedy For President Committee

[redacted] local committee of the Kennedy For President Committee?

A If was an authorized committee. We were the political representative of the Senator in his primary efforts in Puerto Rico.

Q Do you remember the date of that authorization?

A That's what I [illegible]. I think it was around October--the end of October or the beginning of November.

Frankly, I didn't have an exact date, but I do remember that we were one of the--I think we were the last of the committees to be recognized, because there were two factions in Puerto Rico that wanted to represent Senator Kennedy.

And at the end, they finally chose the faction that I belonged to.

Q Did the Kennedy For President Committee, in Washington I am talking about now, set any limits on the authority of the Kennedy For President Committee in Puerto Rico in terms of making expenditures?

it has been [illegible] the way

which we [illegible] participate in national politics.

Some people believe that it is [illegible] and others like me believe that it is not [illegible] dealing with the rules and procedures of the party that is associated with us legally under the Constitution of Puerto Rico.

And when we started to participate in this, I must admit that we were kind of lost. Something that at that time I thought was kind of shameful, but then I had talked to other people, especially from the convention, and they are from the United States and have participated in many primaries and they were as lost, or more, than I was, because the election law is quite complicated.

And since we were the last committee to be chosen and Kennedy was coming to Puerto Rico in February, and the primary was going to be held in Puerto Rico in March, you can imagine what type of organization we had to set up, you know, in such a small period of time.

A Well, they sent us some papers where they had their rules and they indicated that if we had doubts we should call the Committee, the headquarters and that they would gladly advise us on any problems.

Sometimes we have--we used that--let's say, source of information, and sometimes we just played it as we thought it was proper under the rules that we had.

Q These instructions, were they in the nature of legal requirements or were they in the nature of the procedures that the Kennedy Committee would like you to follow?

A Which instructions? Because, I mean--the political or the financial ones?

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

I suppose they'd send us -- for example, [redacted] them then, I think, fifty dollars, we had to tell [redacted] that they sent any how so forth.

[redacted] at times enough, yes.

[redacted] if we needed money, which we always [redacted], or [redacted] from the [redacted] which was not the most orderly headquarters I've seen, but I guess that's part of American politics.

Q What was the procedure you went through if you needed money?

A Well, you know, the procedure was that I was always asking for money, and the results were that I mostly never received money, except when I said, "Listen, if you send me money, I'll stop."

You know, but--from the fund raisers we had to send the money down to them and then they would send us part of the money back, sometimes, and so forth.

But really, let me put--and this I want to have for the record, because I think this experience, and if Puerto

I think it's a very complicated matter, very technical and very [illegible], because you know, you are dealing with so many different people, from different political backgrounds and from different geographical [illegible] of reference that it's very difficult to have [illegible] which maybe does not [illegible] necessary [illegible] to deal with everybody.

I mean, it's misleading in a certain sense and it creates anxiety and it creates a lot of -- I would say, good faith mistakes.

Q Okay.

The Kennedy for President Committee, Puerto Rico did receive contributions, right?

A Oh, yes, sure.

Q Can we go through the steps that were followed by the committee when they received a contribution in processing the contribution?

A Sure. As far as I know, the procedure was, for example, if we had -- there was always, when there was a

Q Would you spell that name, please?

A [illegible], L-U-C-A-S; [illegible]-L-A-S-K-I.

Q Okay.

From there, after you got the card with the information, what did you do with the contribution?

A Well, usually we would send it to Washington and they would send some money back from an official check. Because it seems like there was an administrative procedure set by--as far as I understand--by the committee, whereby you had to send all the money down there and then receive the money back.

I mean, you just couldn't go through the usual and practical procedure of depositing the funds--reporting them, but depositing them right here.

I think that was an administrative rule set by

A In fact,

Q Mm-hmm.

A A lot of

Q A lot of

A A lot of

Q Staff volunteers?

A Volunteers and--lots of people. If you ask me by name, I can't--you know, frankly I would be lying.

Q Would these people--

A Remember what I told you before; this takes place in a very hectic manner. We are recognized and then we have to prepare for his arrival in February and for the primaries in March, which came down to be one of the most, I would say, difficult political battles I--that have ever been held in Puerto Rico.

It was a very emotional campaign. It took a lot of effort; a lot of volunteers, and it was--the two candidates had a lot of backing and it was a very difficult

[redacted]

Definitely, there were directives given by a kind of fund raising committee that I had, which operated, you know, in the different towns. And the people that were signs in the stuff knew that the directives, at least of the cards, those cards printed or photocopied, and so forth.

And it was clear that we had to fill the cards, and so forth. Maybe people didn't understand that. And maybe some of them didn't follow that procedure, maybe some of them.

But, definitely, the intention was always to comply with that.

Q Were there--

A And as far as I know, it was substantially

[illegible]

[illegible] dollars?

[illegible] too many [illegible]

[illegible] dollars, you know.

[illegible] in the street and ask for contributions?

[illegible]

Q Okay.

You also stated that the committee, the Finance Committee made expenditures.

Can you go through the steps in making an expenditure?

A Well, you know, I didn't deal with everything, remember, I am one person only. But, well, like what, for example?

Q Well,--

A For example, if we had to pay a hotel for activity, well, we signed a contract with the hotel and once the activity is taken care of, we pay the bill, and it was informed by our accountant to the people in Washington; the money collected with the signed cards, if it was over fifty dollars.

And sometimes even when they gave twenty dollars

[redacted] But [redacted] the [redacted]. And [redacted] to Washington and [redacted], sometimes, that part.

Q Would you tell the people at the [redacted] in Washington before you made the expenditure [redacted] you would tell them, you made the expenditure [redacted] would tell them before, in terms of [redacted] subdivision, like the hotel and so forth, because these things, remember, there were [redacted] people coming to [redacted] they and give us guidance on security and so forth.

In other aspects we surely didn't ask for any type of guidance. Like I cannot be asking for guidance to print a poster or to buy a pencil, or to--you know, that sort of thing. Surely.

And, you know, in any other way, then, they would have to come down and run the election themselves.

Q Who had the authority to negotiate contracts on behalf of the Kennedy For President Committee, Puerto Rico?

A Well, I had the authority and Doctor

[redacted]

[redacted]

[redacted]

[illegible]

[illegible]

[illegible]

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A [illegible] correct.

Q So the number is that account, 008-[illegible]

A I don't remember my date of birth, I [illegible] for numbers.

MR. GINSBERG: I think if you want to know Mr. Russell's line of it and if he recognizes--

[illegible] that if you have it, that must be it. I don't know.

Now, what I can tell you is--and, you know, I cannot tell you if that was the account or not because there was another account opened--not by me, but by the advance people, who came, I think it was under the time Kennedy came to Puerto Rico.

And they--and I think it was a mistake--but they opened the account in the same bank. And somehow, I think, at a certain point--and I am not sure of this--but I do have my doubts, those two things intermingled. Because in Puerto Rico there are not so many Kennedy's, you know. And they think that the Kennedy account is the Kennedy account. There cannot be three Kennedy accounts or

[redacted] of course, you know.

[redacted] Do not remember the date that that occurred. Not the treasury for President national and, [redacted]

A It must have been more or less at the time that we were appointed. Probably, more or less at the same time that we were appointed to represent [redacted], at the first time we received fund payments.

I don't know. You know, one of the two, probably, at the end of October or in November, again.

MR. [redacted], certainly the bank account would indicate that.

THE WITNESS: Yes, sure. I don't know. But more or less, you know, I guess that would be...

But a bank account was opened, and it was in Santander. And, as a matter of fact, we did it at that time because it's a local bank and we didn't want any confusions with our deals--or, you know, the Chase Manhattan might have one in California or that sort of thing.

That's why we thought it was the best way

[redacted]

MR. GLEAKER: --when he gets that.

BY MS. GERTNER: (resuming)

Q Would you identify that for the record, what you were holding?

Could you identify for the record what you were holding there?

A Sure. I am holding a sworn statement given by me.

Q Do you note that the affidavit says that the bank account was opened on June 18th, 1980?

Is that correct or do you think that was an error?

A I don't know.

MR. GLEAKER: I would think that--

[redacted] ...the June 18th [redacted] ...was post-primary in Pennsylvania.

THE WITNESS: Yes, it has to be.

The primary was held on March 18th.

MR. GLAZER: Off the record, I [redacted] the [redacted] that the account was opened in late October of 1979.

THE WITNESS: It must have been opened in 1979, or it could have been opened in '80, but if it wasn't in '80, it could be in -- maybe January. But not June.

Maybe January, but not June. And that makes sense to me. It might have been in January and not in June.

But I cant recall. I think it would be best if you could get the bank's information on that.

MS. GENTNER: Well, I'll state for the record that it is January. I was just confused about the June, 18th.

[redacted]

MR. [redacted]: Yes.

writing?

MR. [redacted]: Yes.

[redacted]: Yes, I have it, and I am

MR. [redacted]:

Q How about orally?

A Maybe. I guess--I guess that when I opened it, and maybe you can check that with your records, I must have deposited some money given to me. So, if they gave me the money, it probably was to be deposited somewhere.

So, I guess even if they didn't tell me, that was implicit in authority.

But I don't remember. I can't recall.

Q Do you remember if before you did it you told anyone at the Kennedy For President Committee that you were going to open an account?

A I don't recall. I don't recall, frankly.

Q Do you remember telling anyone at the

A [illegible] account, [illegible] account, but I had money for my [illegible] money to make expenditures, I have to have checks to write.

So, it was my thought that I had an account. Which I was permitted to have anyhow. Otherwise, how could I have checks?

Q Why did you open that account?

A And maybe somebody else from the committee told them. I don't recall. You know, I was dealing--I was dealing with the political aspect and those things, for me, were minor things. I was dealing with the political organization, frankly.

Q Why did you open a bank account?

A Where?

Q Why?

A Why? Because I needed a place to deposit the money so that a clear record would come out of it.

I'm not going to--you know, how can you do this? How can you do it? The only way you can do it is if you receive a check from the Kennedy people, is to deposit it

[redacted]

Q [redacted]

[redacted] Kennedy campaign [redacted]

[redacted] account.

A That was after I opened my account.

Q Okay.

A When the Chilean people came to Puerto Rico to establish Senator's trip, they--Carolyn Kellerman opened an account in Banco Santander.

That was another account after my account had been opened already.

Q I am going to hand you what has been premarked as FEC Exhibit 1.

Have you ever seen that before?

A Yes.

Q Would you identify that, please.

A This is a certification that I am the director of the Kennedy campaign and I am the only person authorized to sign on the check account, the current checking account for Kennedy for President.

Q And that's to the--

A And it's directed to whom it might concern in relation to account number [redacted] Kennedy Para Presidente.

Q Did you send this letter to the bank?

A Probably. I don't know. It doesn't say to whom I sent it.

Q Do you remember why you sent that letter to the bank?

MR. OLDAKER: He said that he did not know if he sent it to the bank.

THE DEPONENT: No, I don't know if I sent it.

But by the date, it might have been due to the fact of the different bank accounts, or something; the one that the advance people had opened and that I had.

Maybe there was some confusion and they called me or something.

But I can't recall, exactly.

I can't recall, but it might have something to do with it

MS. GENTNER: I would like this entered for the record, please.

0204033336229

[illegible] account [illegible].

A Well, my secretary did some deposits in that account which I was informed of, and it is [illegible] responsibility because [illegible] for me. She [illegible] for the committee, she works for me.

All of those funds were reported to the general committee. And I think they even have cards on those. And they were probably of small denominations, which didn't have to be informed, anyhow.

Q Did anyone else--do you know if anyone else at the Kennedy for President Committee, Puerto Rico made deposits into that account?

A No, I don't think--I don't know of anybody else that made deposits.

Although, I have--although I have doubts of whether some of the things that appear as deposits in that account were deposited by me.

I think that what happened--and this is a speculation--you go to the bank and find out--is that since those two bank accounts were opened, I think they

[redacted]

[redacted]

[redacted]

Q So, you are talking about the reason why you made direct deposits, your secretary?

A The reason why she made them and that I have responsibility for that.

Q As opposed to sending it to Washington?

A Yes, as it was usually done.

Q Did you make a deposit of four thousand dollars on February 26th, 1980 into that account?

A I don't remember the date, but if it's--if I said I did, I did.

Q Giving back what has been marked as FEC 2--

A Well, if it's backed up by a letter of the bank--okay, for the amount of six thousand three hundred twenty-five.

[redacted] that I told you [redacted] from [redacted] account of the [redacted] people to [redacted].

I don't recall.

Q So, this doesn't refresh [redacted].

A [redacted], I don't remember. I don't [redacted] if that's there, somebody [redacted] deposited it, you know.

It's either that they transferred it from that account or that I deposited it. You know, I don't know, one of the two.

Because this--I mean, the other alternative is that somebody went and deposited it. But I don't have knowledge of that. I must assume--and I can't remember, I was dealing with too many things at the same time--that if it appears there, somebody with authorization from me deposited it, or the bank committed a mistake transferring the funds from the other account.

I don't know.

Q You don't have an independent memory of it, so you wouldn't be able to answer any more questions about

A I have no recollection. I might [illegible] don't know. I don't have a clear memory on that.

Q Twenty dollars on March 19th, [illegible]

A You know, the same. Probably in [illegible] dollars. But, you know, twenty dollars I [illegible] like remember. You know, if it was--

Q Six thousand three hundred and twenty-five dollars on May 11th, 1960?

A That was the one deposited by my secretary, yeh. And this is what is here, with the cards and so forth.

And the other one, the same answer. Three hundred sixty-five dollars.

Q And you stated you always told the Kennedy people in Washington about your deposits.

Do you remember when you told them about this April 11th, 1960 deposit?

A I don't know if I told them about that.

Q You don't know?

A I don't know if I did or not. Maybe I did;

[redacted] people, I don't [redacted]

[redacted] that we had to deal with all these [redacted] procedures, I would certainly not accept any type [redacted] liability.

I am a person of high reputation in Puerto Rico.

Q Okay.

Referring back to your affidavit, again. If you go to the supporting documentation for the three hundred--the six thousand three hundred and twenty-five dollar deposit.

A Um-hum.

Q Some of the checks here.

A Um-hum.

Q The dates on the checks, such as March 6th--

A I think that what--this is what I mean.

I think that what happened with this--and, again, this is what I--I am not sure, but I can speculate that many of the checks, they started to come in, you know. Sometimes people didn't pay one thing and then they send

[redacted]

Q Did you have any procedure to assure that the contributions were either deposited or forwarded to the Kennedy people in Washington within ten days?

A Well, I don't know if it was in ten days. We tried to do it in--not in ten days, less than that; because the sooner we sent it the sooner money would have come down.

But I cannot assure you that all the time a ten day's limit was complied with. I don't know.

MS. GENTNER: I'd like to have this entered into the record.

(Off the record.)

MS. GENTNER: Back on the record.

BY MS. GENTNER: (resuming)

Q Did you make a deposit of three hundred and sixty-five dollars on June 13th, 1980?

A Probably I did. I don't remember, you know, doing it positively, but probably my secretary did.

[illegible] after the primary [illegible] Puerto Rico, [illegible] had an issue [illegible] whole thing was possible or not, because the Republicans [illegible] the Democratic primaries [illegible] different dates and we wanted to vote on the same day, so that only the Democrats voted in the Democratic primaries and only Republicans in Republican primaries; something that was given later on to us, but after the primaries.

And, you know, this is not saying, you know, it's not as easy as turning on and off a switch and it's all dark and it's all light. No, it's not as--it was a complicated thing. And I just can't remember all the details.

Q I understand.

Did the Kennedy for President Committee in Puerto Rico continue to receive contributions after the primary in Puerto Rico, which was March 16th, 1980?

A I don't think so. Maybe it might have received, you know, some small money, like, you know, somebody was writing a letter; I am going to send one dollar

[redacted]

Q [redacted]

[redacted] five dollars was made.

A Yeah. But [redacted] it was [redacted] -- that have been received before. I mean, people might have bought a ticket and had not paid for that ticket -- sent it to somebody that was -- that kept the money and then brought it to my office.

As I tell you, a lot of people were dealing with this and it was very informal. So, you know, --

Q So, you can't tell me whether these --

A I can't tell you whether that was given at that time, you know, after the primary, or if it was given before the primaries and it was kept by somebody or, you know, I don't know.

It's impossible to remember.

I can tell you that we have made a full disclosure on everything, because I -- that's another thing.

MR. OLDAKER: Which was so also indicated that

[redacted]

[redacted]

[redacted]

[redacted]

you anticipate, [redacted]

And [redacted], as the [redacted] were done by our accountant.

Q Did you keep any sort of regular procedures with time distinctions for seeing what it was--

A I don't know we did; I don't know. Maybe we did; maybe we didn't. Maybe we didn't sometimes, and maybe he did at other times.

Because as I am telling you, you know, we had the accountant that was dealing with this. But I don't know if he personally--the first problem is--and I found out this later on--he doesn't speak too much English. So, I don't know if, frankly, understood the whole thing.

[redacted]

Q Was the bank account closed?

A I think it was closed.

[redacted]

[redacted]

but I am not sure.

But it didn't have any money, so..

BY MR. DEUTSCH: (resuming)

Q You say it didn't have [redacted]?

A I don't think it had any money. If it had some, I don't know, it might have one dollar or two, but I don't think too much money; not enough to buy an ice cone, I don't think.

Q Do you have any idea when it was closed?

MR. OLDAKER: He already said that he did not know whether it was closed or not.

THE DEPONENT: No, I don't remember. I wish I could remember those details but I--you know, remember, I have my private practice, my

[redacted]

[redacted]

[redacted]

[redacted]

Q [redacted]

[redacted]

many of these things, which I thought were not

important things, were dealt by my [redacted].

Maybe she showed it to me and I skimmed

through it and thought that it was not important.

I don't remember.

If I told you that I remember, I would be

lying.

BY MS. GERTNER: (resuming)

Q Okay.

I am not asking--I understand that you don't

remember seeing this letter.

A I don't remember seeing it. But the context

of that letter is to the effect that they are asking to be

[redacted]

A Let [redacted].

[redacted]

[redacted]

[redacted]

A Now, I tell you, this is a continuation from the book making reference to that laptop. And it might have been dealt by my secretary, and probably she brought it to me, but I didn't pay too much attention to it.

I don't remember the letter. I don't think it's so important, so, I don't remember it.

Maybe I saw it; maybe I didn't see it. I don't know. I don't know. I can't answer you because -- if you want answer that is not true then I can answer you, but the answer is I don't remember.

MS. GENTNER: Enter that into the record.

THE AFOREMENTIONED DOCUMENT WAS MARKED AS FEC EXHIBIT NO. 4 FOR IDENTIFICATION.

[redacted]

A [redacted]

Q [redacted] do you mean by that?

A [redacted] do you mean by the date of the [redacted] Do you know that the marathon varies?

Q [redacted] maybe you'd better explain that.

A [redacted] Sir, your question is to explain how the radio [redacted]?

Q Yes, let's strike the [redacted] to that.

A [redacted] radio marathon is a procedure used very commonly in Puerto Rico to raise funds from the people in the different municipalities.

And it is a way to raise, dollar by dollar, a large amount by involving a lot of people in the procedure.

The way they usually do it is they put--they assign quotas to the different municipalities and there they are in charge of collecting their quota. And then, one day, the day that has been set for it, there is a radio or a tele-marathon, depending how--you know, how you want it, and in that case where there is a transmission in terms of the radio saying that people are bringing money and that

[redacted]

the playing for the public system.

A [redacted]

[redacted] with them directly. The public explosion was built by Admiral Rickover and by the president of the -- at least I think they planned it. The president left the [redacted] Whitney, Quinepeak.

I did know about it and I -- I knew the person that handled the radio transmission, he is Hector Modenti, which is now dead.

Q How about the date of the radio transmission where they say everybody come?

was or less around the [illegible]

Q [illegible] Do you know if any [illegible] Commissioner in Washington [illegible] that [illegible] would go on before it happened?

A I don't know.

Q Do you know if any [illegible] Puerto Rico Legislature [illegible] Committee, Puerto Rico in putting on the radio broadcast?

A No. Hector [illegible] was the person who dealt with it.

Q Can you tell me how the contributions were received in the radio marathon?

A Well, I don't know because I didn't deal with it. But the usual procedure in all political experiences that I have seen--and I am not a finance person--is that they assign quotas and then they bring the quotas in.

Surely, there are some times some people come in and, you know, give maybe five dollars, one dollar, ten dollars, you know, at the same day that the transmission is

[redacted]

Q [redacted] the money was collected?

A [redacted]

Q [redacted] anything about what happened to [redacted] still don't?

A I know why that happened it. I--

MR. OLSHAKER: Did you know at the time?

THE DEPONENT: At the time, no. I didn't deal with that.

BY MS. GERTNER: (resuming)

Q [redacted] did the money go? I mean, that was collected.

MR. OLSHAKER: Do you want--is the question does he know where it went at the time?

THE DEPONENT: I--

MS. GERTNER: No. He says he knows now.

THE DEPONENT: It would be hearsay, but I--I mean, but--

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

[redacted]: Well, I [redacted]

[redacted]: Yes.

[redacted]: Do you want him to [redacted]

on this basis?

THE [redacted]: I [redacted] if you [redacted], I don't mind.

MR. [redacted]: If you'll permit him to.

MR. [redacted]: Only on the basis that it--

let the record indicate that he is testifying on--

[redacted] personal knowledge at the time, but

on

THE [redacted]: To the best of my knowledge,

[redacted]

MR. [redacted]: --his best information and

belief at this time.

THE DEPONENT: To the best of my knowledge;

to the best of my knowledge, most of that money

went for publicity.

I think that what happened there was that

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted] agency was [redacted] like to send back and forth the money, [redacted] supposed to keep that in escrow as a [redacted], and then, and then, that would go over to Washington and the money treasury and they would be paid.

That's as far as I know. But somehow, it didn't happen that way. And that's as far as I know.

BY MS. [redacted]: (resuming)

Q Who is the source of your information?

A Well, I talked to the people in the agency and I spoke to Miguel Rivera and I have spoken to Victor Gutierrez, the president of the committee.

And more or less, this is the information that I have gathered.

If I would have been asked at that time I would surely have advised to do it in another matter. But it was, I think, a mistake in terms of the understanding between

HEMLOCK ERASABLE COTTON CONTENT

A [illegible]

Q [illegible]

[illegible]

A [illegible]

Q [illegible]

other than those connected with the [illegible]

A No, no, no, they didn't perform services related to the radio marathon.

Q They did not?

A No. I told you it was Hector Mohedi.

They performed work for the committee in terms of publicity for the [illegible]

Q So, they didn't do anything [illegible] to the marathon?

A To the radio marathon it was Hector Mohedi who was--used to be one of the top people in Puerto Rico in media. And he is dead now.

Q Did you contract with Lopito Ileana & Howie on behalf of the Kennedy for President Committee,

HEMLOCK
ERASABLE
COTTON CONTENT

[illegible] that we have, you know, they would not be -- [illegible] the product. [illegible] and I would guess [illegible] would pay [illegible] basis.

Q Was there any agreement as to the [illegible] of credit for the Kennedy for President Committee?

A I don't know; you have to ask them about it, because frankly, I don't recall.

Credit in what sense? I am sorry. I mean, credit in the [illegible] sense, I know that they requested us to pay -- that they [illegible] I remember that they had to pay, for example, for time, they had to pay in advance to the t.v. station and the same for the radio and the placement of ads, you know, and so forth.

So, you know, it was a matter of that they didn't want to get a bill of fifty thousand dollars and not having received a cent of it.

In that sense, we were clear that we had to be

[redacted] and that's the way it happens or has in the past. Was it [redacted]?

Q Were you required to pay the entire [redacted] in advance for media time buys?

A Not always, no. I mean they [redacted], I have to go on t.v. I have to pay X amount and--I don't remember; I think radio was different and t.v. was different and the newspaper was different.

But we did have to pay them, because, you know, [redacted] once we approved them, because they had themselves to pay and they couldn't--and they say that it was against the regulations that they pay anything if we didn't pay them before.

And since, you know, that everything that is--that goes to t.v. or to radio has to be informed directly by the station to the agency. I mean, you know, it's clear that you have to do it that way.

And, as a matter of fact, I think that maybe--and this is a speculation--maybe that was the reason they decided to use the cash money instead of keeping it in

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

I did [redacted] the advertisements and so forth.

Q To Lopito?

A To Lopito Rivera, yes.

The thing is there, you know, as the campaign progressed, I was more and more involved in the political aspects of the campaign, going to all the shows and so forth, you know, I was--and then the President was taking care of that.

Q And when you would write a check to Lopito, could you tell me what would happen; would someone call you on the phone from Lopito or would they send--

A No, I would go there. I would go there and say, okay, what are we going to do? Well, we have this

HEMLOCK
ERASABLE
COATED CONTENT

Q [illegible]

I am going to [illegible] that have been [illegible] Exhibit 5-[illegible] 5-62.

A Yes.

Q Do you recognize those?

A Sure.

(Pause)

Q Can you identify them?

A I can identify that [illegible] as an invoice from [illegible] publicity agency, and it says [illegible] Kennedy Presidents, and then it has a description of the job and it goes down with a description of the different items that are dealt with in the different invoices.

MR. OLMER: The question--the question is do you specifically recall seeing these before?

THE DEPONENT: I have seen--I recall having--specifically, the first one I recall, because it

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

A [redacted] but I don't--I don't

I would have to [redacted]. And, definitely, I would

tell you that the--if your question is whether I remember

specifically every time they gave me one of these invoices,

definitely not.

But I do remember some of it, and I know they

gave me invoices.

Q Okay.

How about generally--

A This one--for example, this first one, I

remember like it was yesterday, this one here.

And--

Q The first one. Let's go to the first one.

A I'll go to the first one.

Q Do you remember when you received that?

MR. OLDAKER: The date?

BY MS. GENTNER: (resuming)

Q Did you receive that; first of all?

A Well, they gave it to me on--sometime,

MEMLOCK
ERASABLE
COTTON CONTENT

[illegible] Victor Gutierrez and [illegible].

[illegible] I mean, it has me. [illegible] of the examples, most of the things [illegible] me. Then, [illegible], after the examples past the, you know, the [illegible] had to do some work, also. [illegible] worked on that.

Q You explained before that you would go down there and you would talk about the--

A I would go down there and, for example, the jingle, but after, with the jingle. Okay.

[illegible] needed a jingle. Well, they told me, okay, we have Alberto Carrion; he is a Puerto Rican and a very talented young man. He will be willing to write the jingle. Do you think we should try it?

Yes, let's try it. Okay. Do I have to accept? Well, no, you just--he writes it, he writes the music and you listen to it; if you like it, you accept it, okay, let's go ahead.

HEMLOCK ERASABLE COTTON CONTENT

[redacted]

[redacted]

[redacted]

[redacted]

A. I don't [redacted]

Q. Okay.

Did you ever give--if you got an invoice like this, did you ever give it to anyone at the [redacted]?

MR. [redacted]: An invoice like this, [redacted] Howie?

MR. [redacted]: Maybe.

THE [redacted]: Like this?

MR. OLIVIERI: Are you talking about 3-M, or--

MS. [redacted]: No, no, just---

THE DEPONENT: No, no, no, so, just any invoice.

MS. [redacted]: An invoice from Lepito that you [redacted]

THE DEPONENT: The ones that I paid personally I didn't give to anybody. I dealt--well, I might have given it to the people that were filing and so forth, the invoices or the reports, and to the accountant and so forth, that

HEMLOCK ERASABLE COTTON CONTENT

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Q I see. Okay.

Let me show you what's been marked as Exhibit 3 to your deposition. Do you recognize that?

A Yes, I do.

Q What is it?

A It's a check.

Q Is it a check that you wrote?

A Yes, it is.

Q Okay. Do you recall writing this check?

A I might have written that, but I don't recall writing that check.

Q Okay. Do you recall writing the memo on the

[redacted]

Q [redacted]

[redacted]

A [redacted]

[redacted]

MR. OLDAKER: I want to enter [redacted]

[redacted]

[redacted]

[redacted]

BY MR. OLDAKER: (Resuming)

Q You don't remember paying him yourself?

A Maybe we paid him--

MR. OLDAKER: Are you asking if these--

THE DEPONENT: I think we--

MR. OLDAKER: --four checks here?

MS. GENTNER: Yes, if Mr. Lessell--

THE DEPONENT: Yes. No, I--

MR. OLDAKER: In this instance?

THE DEPONENT: No, wait.

In that instance, I don't remember drawing those checks myself.

MR. OLDAKER: You are clear on that?

[redacted]

Popular de Puerto Rico. [redacted] copy that attorney for [redacted] of the affidavit [redacted]

Also, they [redacted]

[redacted]

MR. CHAVEZ: (resuming)

Q. Did you [redacted] perform these [redacted] for the remedy For President Committee, Puerto Rico?

A I spoke with David Sawyer and with somebody else that he sent, and I didn't contract with him as a person.

I do remember that there is a--I am trying to

HEMLOCK
ERASABLE
CARBON PAPER

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

Q Okay.

You testified before [redacted] Committee [redacted] that you made an expenditure.

So--

A I didn't say that. I said that I had--

MR. [redacted]: His accountant.

A --my accountant was supposed to file the reports and, you know, keep the records and so forth for the whole amount and that I hoped that they were filed.

I'm sure that we did substantially at least comply with most of the requisites.

BY MS. GENTNER: (resuming)

Q Do you know if the accountant reported this

[redacted]

Q [redacted] Committee and the Humphrey for President Committee, there's also a document

A Well, I knew by the conversations that they requested documents, yes.

Q Were you asked to bring documents in compliance with that subpoena?

A I think they told me to put forward anything that showed the truth of the whole transactions and so forth, which I think I did; the reports and--I don't know what else, if anything, I sent.

But whatever I had, I sent.

Q Whatever you had, you sent.

BY MR. [redacted]:

Q Was [redacted] to direct that money to the national committee, the national [redacted] committee, whatever you want to call it, collected locally to Washington.

And do you recall if that was generally the "slip system"

Were they supposed to send back the same amount of money that you sent them?

A They were supposed to send down the money.

And I know that once I traveled to Washington because I--sometimes I didn't receive the money with the urgency that we needed it.

And, you know, I thought that was very unfair.

Q Initially, starting with whenever the campaign started in Puerto Rico, did you send the contributions to the national office?

A Yes, I did send the contributions.

[redacted]

[redacted]

[redacted]

[redacted]

[redacted] NO. 1

[redacted] NO. 4

[redacted] NO. 5-A [redacted] pg. 61

[redacted] NO. 6 pg. 62

[redacted] NO. 7 pg. 64

[redacted] NO. 8 pg. 69

[illegible]

[illegible]

[illegible]

[illegible], a Notary Public [illegible]

[illegible] proceedings, [illegible]

[illegible] of knowledge and ability, and that I, [illegible], am [illegible] to be retained to [illegible] under [illegible] direction is hereinbefore set forth;

That the foregoing pages are a full, [illegible] correct record of the proceedings in the aforementioned matter;

That I am not of counsel or attorney for either or any of the parties to said matter, nor in any way interested in the outcome of the cause named in said action.

Olivia D. Gleason

OLIVIA D. GLEASON

[redacted]

_____day of_____[redacted],

_____

Notary Public

2040033

FEC
DOCUMENT
SEPARATOR

HEMLOCK
ERASABLE
COTTON CONTENT

APPEARANCES

IT IS HEREBY STIPULATED AND AGREED by and between counsel for the respective parties herein that this deposition may be taken pursuant to the Federal Rules of Civil Procedure.

IT IS FURTHER STIPULATED AND AGREED by and between counsel for the respective parties herein that the presence of the notary is hereby waived.

IT IS FURTHER STIPULATED AND AGREED by and between counsel for the respective parties herein that all objections, except as to the form of the question, are reserved to the time of trial.

IT IS FURTHER STIPULATED AND AGREED by and between counsel for the respective parties herein that the parties shall have seven days after receipt of the transcript to notify counsel of any corrections or objections and that thereafter, the transcript may be deemed as a true and correct copy.

* * *

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Interpreter

* * *

9204033676

[illegible]

[illegible]

[illegible]

[redacted]

BY MR. [redacted]:

Q [redacted]

A My name is Miguel A. [redacted],

Q And your address?

A [redacted]

Here by, [redacted]

Q Mr. Rivas, are you represented by counsel here, today?

A Yes, I do.

Q And will you identify [redacted], please?

A Mr. [redacted]

MR. [redacted]: Gilbert.

THE INTERPRET: Gilbert. The pronunciation is what I wanted to make sure of.

HEINLOCK
ERASABLE
COTTON CONTENT

A No, I do.

Q How do you feel of this group?

A The people working for the candidate, himself related to me--or were closely related to me at the time that I was working for the Popular Democratic Party.

By coincidence, the group of people working on the campaign were my friends, my colleagues and certainly, originally, before and later on the Popular Democratic Party officials.

Q Did you--did you perform any activities, voluntary or otherwise, for the Kennedy for President Committee in Puerto Rico?

A Yes, volunteer. I performed some. Particularly, the last stage of the campaign, before the primary.

Q Did you have any title with the Kennedy for President Committee?

A No, none. Just a volunteer; helping.

Q What kind of activities did you undertake, generally, as a volunteer for the Kennedy for President

[redacted]

Q Did you have the authority to make [redacted] contributions on behalf of the committee?

A No. No.

Q Did you have the authority to [redacted] the contributions for the committee?

A In a way yes. You, [redacted] precisely trying to -- or helping the committee raise the funds that were necessary for the fundraising campaign.

Q Was there any specific [redacted] for the Humphrey committee that authorized you to solicit the contributions?

A Well, the campaign, at the time, was in charge of people like former governor [redacted] Colon and Miguel Lausell was the director, the campaign director. And both persons contacted me and recruited my help to work for the committee.

Q And when was that?

A That was -- I would say about three, maybe three to four weeks before the primary date. That was -- the

[illegible]

A [illegible]

Q [illegible]

A [illegible]

[illegible] and [illegible]

by the director of the [illegible].

And, of course, I was in daily contact with Josephine Colen, [illegible], as the deputy director who was in charge of engineering [illegible] Radio Moscow.

Q You assigned the radio marathon.

A Correct.

Q Were you in charge of that?

A Not exactly.

But I should explain first, because the radio marathon is a very important local activity that requires certain explanation to fix my role, my position within the radio marathon.

It happens that at the time I was the director

[redacted]

[redacted] and telephones. I mean--I was I got involved in the campaign in the beauty [redacted] campaign [redacted] organization, again in the field [redacted]

Now, in the radio campaign, although [redacted] was a coordinator in this particular case, I think the coordinator, for all purposes, [redacted] Miguel Lausell, the attorney who was the director of the campaign.

And all other people, I say humanely, were working towards the goal, the objective, the basic organization created for the radio campaign.

So, I would say that I would be placed in a -- placed in a position of a volunteer helping in the radio station, providing my--whatever expertise I may have, my experience; helping in whatever activity or organizational activity required, reporting to the men in charge, to the coordinator, who is the director of the campaign, Miguel Lausell.

The--that effort required from me to contact

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted] as the case may be, [redacted]
[redacted] is raising big money in the [redacted]
in the workshops. And then you just [redacted]
and just put it on the table and start [redacted]

And then you raise the amount of [redacted]
what they say.

I'd say [redacted] of the things you [redacted]
raise the total quota. The quota is an objective,
but the idea is to get them to work towards that
goal. If you [redacted] that goal there is a [redacted] and
a lot of noise, "I raised my quota."

This is the [redacted]. Hey, as long as you
are raising money, since the time that the
marathon was announced that it was going to happen,
I mean since the basic organization has been
established, the funds raised could be given in
portions, as soon as raised, to the central point,
or--and it happens many times--they wait until the
radio marathon is held, so that publically, in the
transmission, "Here I am, the representative from

[redacted]

[redacted] a very unusual problem. First, they would do this to show the constituents, the people back home, that they delivered the money; that the money came to the final point.

It's a matter of getting the people off their backs. And secondly, a political motivation, because they are saying, "I am successful. I comply with the requirements of my political duty."

So, this is the way it works. A lot of cash, a lot of cash--in fact, you know what I have to do? I have to mobilize the whole finance unit. And when I say finance unit, it is ten or twelve or fifteen people, just with many machines to count the coins, the change, and have rolling machines and to classify the money and put it in proper shape for depositing, if it is going to be deposited.

In other words, the amount of money, all of a sudden coming in, is so big that it requires

HEMLOCK
ERASABLE
BOND

[illegible] the same [illegible]

[illegible] the way, I would say with [illegible] or eight cops, depending on how you look at it.

First, as long as the Kennedy campaign [illegible] is not a political party in public like, having the organizational skeleton throughout the [illegible], the [illegible] was to volunteers in different areas, but not [illegible] on an organizational standpoint.

For instance, we are not saying a word to the president of the committee of Jaycees, because there was not such an organization. It was a committee, basically.

So, this is different from the explanation I gave you before.

And the second is that the goals, in terms of collections, were not so high. Because when I am saying the radio marathon or a telethon of power, the political party

[illegible] ERASABLE [illegible]

[illegible] people [illegible] them, and it still [illegible] that [illegible] most effective, either, [illegible] way of [illegible] [illegible] course of [illegible] [illegible] [illegible] people, [illegible] [illegible] involved, [illegible] [illegible] and they are [illegible] don't [illegible], and if they have fifty dollars in their [illegible] they just put it in, and this [illegible] [illegible]

And this is a real [illegible] way of [illegible] money.

And the--for instance, if it is on t.v., the people want to be seen on t.v. putting a dollar in the--giving the dollar to the leader and so forth. So, it's a very effective way.

Q When you say "we," we decided to have it, when you talk about it, who is "we?"

A Well, in the last part of my sentence I am referring to the political party when I say the radio marathon. I was taking differences between this one that

[redacted]

[redacted] was an organization

[redacted] I may speak out of turn,

[redacted] the [redacted] Clinton.

And when I say "no," I still have to the [redacted]

[redacted] campaign committee, in the late [redacted]

Q Mr. Hamill and [redacted] Committee, [redacted]

A [redacted] Clinton Committee and Miguel [redacted]

that's right.

They recruited me because, again, they were not

so well related with this type of activity and I was [redacted]

that before. So, possibly, I could be helpful. That is

their estimate.

Q Did any person or agency or corporation assist

you in [redacted] time buying for the radio [redacted]?

A Well, not that I was directly involved.

Again, because I was a volunteer in the organizing of the

fund raising.

But I know that Lopiz Llenas & Davis were the

advertising agency involved in the promotion of the campaign.

In fact, I remember that I personally went to the agency

[redacted]

[redacted]

MR. [redacted]: Sir, I'm [redacted]

MR. [redacted]: Yes, I [redacted]

THE REPORTER: Saying, [redacted] the [redacted] yesterday?

MR. [redacted]: Right.

MR. [redacted]: Right.

THE WITNESS: Oh, I'm sorry. I didn't know you were talking about that.

No, I didn't personally do that, personally. I did not make that sort of arrangement. I suggested ways of doing things, but not necessarily I performed, myself, in each one of the actions that had to be taken.

BY MR. [redacted]: (resuming)

Q Do you know who did, if anyone?

A Well, to give a name now could be irresponsible on my part, because I am not sure, honestly. Honestly, I am not sure of the person involved.

Q The people on the street corners who collected

HEMLOCK
TRASABLE
EDITION CONTENT

[illegible] Usually, in each [illegible] there are [illegible] there are between, 15 or [illegible] a major [illegible] one or [illegible] certain area, the [illegible] whose responsible for getting [illegible] would recruit [illegible] people within his constituents to help him in getting [illegible]

Q Were the leaders you're talking about [illegible] they people of Puerto Rican [illegible]

A Volunteers.

Q —volunteers?

A Volunteers. People working that because of their position they are known and they are well known, they can move people or control the voters, you know, the voluntary workers.

Q Did you have any part of picking these local leaders?

A No. No, that that is more a political function.

Q Did you give these local leaders any instructions, procedures to follow in collecting the contributions?

A Usually not. I mean, in this particular case they were not given for one reason: the activity held, basically, it was not something new; something that they

[redacted]

[redacted]

[redacted]

[redacted] people with money.

[redacted] you have to approach that [redacted] way.

Q [redacted] experiment?

A I remember it was about--the exact figure, sorry, I could not give, because of the--it's very difficult for me to state, but it should be something around ninety-nine or ninety-eight thousand dollars. Around that figure.

In fact, the figure, you may have one today, but perhaps tomorrow count one hundred dollars or two hundred dollars missing from a six pack, nine--it may change.

But the figure that you could take is the last one from those periods. And I say it goes over--above--over ninety thousand--that it was over--that it was about ninety-nine thousand dollars.

In fact, I said ninety-nine thousand dollars in

HEMLOCK
ERASABLE
SUPPORT CONTENT

[redacted]

[redacted]

[redacted]

ERASABLE

[illegible] you may see pieces of glass [illegible] the paper people who did the counting were [illegible]

A Well, in this case it could be said that the big [illegible] because [illegible] the supervisor [illegible] on the paper helping to the area and handing the [illegible] I would be around the area being sure that the money is placed where it should be placed; that the money is coming and put in there.

Now, another very possible thing that is that I, the case, I say, "Listen, you place the money here, please [illegible] me, go back.

You go to the microphone, they the person will call him, have come up. So and so, and give--and I call him, "Come here, put the money here."

So, it's a matter of assuring that the money exactly comes to the place where it is being counted.

And that, basically, is the important thing, in the activity itself. And you know why? In the radio

[redacted]

[redacted] and then, his main duty seems to be a [redacted] and [redacted]. And, therefore, as you [redacted] the people coming in and you [redacted] the only assurance that you like to have--and this is by this question--is to have a special place that could quite easily accomodate, to have your people, the people that you think and the equipment to help you in coming and going and that the many come in that place.

That, all of that, you don't have any other choice to do--you don't have a choice to do anything else.

Q Did you have such a place with the--

A Well, the place, in this case, was the area within the committee, the Roosevelt Avenue, where the campaign headquarters were, Roosevelt Avenue--I don't recall the number of the building, but it was an old house right there.

[redacted]

[redacted]

[redacted]

[redacted]

Q [redacted]

A [redacted]

Q [redacted]

A [redacted]

Q [redacted]

A [redacted]

Q I'll also use a [redacted] of the

questions.

[redacted] would indicate

the body and chest up and the male member they

came to the [redacted] Exhibit Number [redacted]

there the questions are [redacted]

[redacted] and you can [redacted]

[redacted]

Q [redacted]

A And [redacted] and put it together, yes.

Q Which people [redacted]

A [redacted]

HEMLOCK
ERASABLE

[redacted]

[redacted] you have a mass of checks, personal checks, small checks. Again, small checks, because there is value again, the way it is collected and the necessity of doing it initially doesn't let even the donor to play check. Say, it's a matter of giving five dollars, he doesn't have cash, maybe he gives a check of five dollars.

But the volume of checks are minimal. That's the reason why we have to depend heavily on a lot of people to count the money. We have to have a lot of bags and simply the coins; pennies, dimes. Checks come, but not so many; not so many.

And in all of them, I would say all of them--I say

[redacted]

A Um, Mr. It's very--it's highly unusual, even [redacted].

[redacted] Well, shall we [redacted] to [redacted] [redacted] to [redacted] as [redacted]. So [redacted] [redacted] [redacted]

[illegible]

Q [illegible]

A [illegible]

Q [illegible]

A [illegible]

Q [illegible]

A [

By --while it goes to a certain, proper place. But it is placed in a safe until you finally get it out and do whatever you want to do with it.

Q And in this specific instance, was it placed in a safe for that.

A Yes. Yes. When did you deliver--

Q A safe at that Kennedy for President Committee headquarters?

A At the story, at the time--but's one if I... I'm thinking of the way that was helping us in this.

A I don't recall if it was Monday or Tuesday. Be a matter of a while, a safe in terms of combination, no, not that type; not a safe that way.

Safe, when I say safe, it is a place where it is properly custodied. But that kind of the--

THE INTERPRETER: Safe vault.

THE WITNESS: A safe vault. It was Monday or Tuesday of the week, at the very early, because that type of activity, it was not necessarily available there.

BY MS. GUNTHER: (resuming)

Q Maybe it will help you. What I am looking for is chain of custody; who had it all the way--

A Well, I just say that I, myself, put it away. I kept--because I personally delivered to Lopito Ileana &

[illegible]

Q How did you [illegible]--

A [illegible]

Q [illegible] How did you deliver it in terms of [illegible] Did you say, Here [illegible] Would you please tell me how you delivered it?

A I don't recall if it was Monday or Tuesday, [illegible]. If I recall accurately, the radio [illegible] was held on Saturday, Saturday afternoon.

Q Correct.

A And it's not sure if it was on Monday. Sunday it was out, for sure. I am sure of that. It was Monday or Tuesday, but it was at the beginning of the week; at the very early beginning of the week, of the next week.

Q Two or three days after that?

A Yes, yes.

Q Okay.

A I think it was more Tuesday, because what we do is that--and this is also regular, a regular pattern--that once the activity is over we review and we make a second

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

[redacted]

[redacted]

after he loses the primary.

Q Did anyone suggest that you make the money available at the system? Because you have to, there is an check?

A Yes. Yes. Dexter Gutierrez and Miguel Lausell. Particularly Miguel Lausell. When you are in competition with

Q Do you remember when they asked you to do that?

A It was, most probably--although I cannot say exactly--on Tuesday, or Monday afternoon.

But in the first place, because we have to know for sure--I mean they have to know what amount of money do we have. A receipt and told them--and I told them upon instruction

I remember that they explained to me that they had a problem with the agency because they had to put the money. They didn't have enough time to do anything. They had to put the money at that time.

That was the last week of the campaign and there was--the agency was working on the advertising, the program for the last days. And in political campaigns--probably in the states it's the same--I'm not sure, but here in Puerto Rico you have to pay in advance, and you have to pay either cash, certified check or manager's check. They don't trust a check--your own check.

So, we had to--we had to pay that at the time or otherwise we would have no ads during the last three or

8204033708

[illegible] Highlands, [illegible] Highlands
[illegible] Highlands [illegible] Highlands
[illegible] Highlands [illegible] Highlands
[illegible] Highlands

[redacted]

[redacted]

[redacted]

A [illegible]

[illegible]

[illegible] is that it does not [illegible] with [illegible]

Q Does that suggest, Mr. [illegible], that [illegible] you [illegible]

A Oh, yes, sir. [illegible] [illegible]

Q No, I mean were you told [illegible] by somebody at [illegible] to [illegible]

A That's right, sir. [illegible] to sit down with the man to be adopted and [illegible] money and get the receipt.

Q Do you remember what [illegible] said is that you got the [illegible]

A [illegible] starting-because it was drafted. In that, I drafted the receipt, because I wanted to [illegible] [illegible] was given on that basis of doctor. [illegible] to pay whatever they were charging was supposed to come through a check.

And they accepted that, probably thinking that

HEMLOCK SOCIETY
ERASABLE

[redacted]

[redacted]

[redacted]

that--you must realize that when you are dealing with twenty-four hours work, sometimes twenty-four hours, I am not telling something that is not true, in the midst range of a very hard campaign with so many pressures from so many people and dealing with so many problems that everybody is conveying to you, it's really--it really puts you to sometimes forget or don't be as conscious about some item and getting to the others.

And remember, I have pressures of the other side, also. That's the reason when you get older, when you get into this business.

(Off the record)

BY MR. CRITCHER: (resuming)

Q I am going to hand you what has been marked as PEC Exhibit 2.

Have you ever seen--

A Ah, sir, I remember, Julio Morales, yes.

Yes. Julio Morales. Is he still there, working with Lopito?

Q Have you ever seen that before, what you have in your hand?

A The first one or all the pages?

Well, not that I handled them. I mean not that I dealt with them. Maybe, it could be. I have seen invoices of Lopito Ileana & Howie.

8204033713

[redacted]

[redacted]

[redacted]

[illegible]

[illegible] didn't [illegible]

[illegible] the [illegible]

[illegible] never I was [illegible]

[illegible]

MR. [illegible]: We'll [illegible]

[illegible] MARKED AS [illegible]
NO. 1 and 2 FOR IDENTIFICATION.

[illegible]:

[illegible]

Q The checks that did come in for [illegible], what did you do with those?

A These checks are made to cash, [illegible] because the people they do it pretty fast, [illegible], when the checks to cash. They don't come [illegible].

Q They were all made out to cash?

A To cash.

I don't recall seeing any check issued if she were [illegible] entity, as far as I know. Because if that were done, they would not be [illegible] endorsed nor used by -- in the way we use those forms.

Mr. I say that checks to cash; cash checks, one dollar, two dollars, five dollars, ten dollars.

Q And you handed them over to Lopito?

A Yes, because these checks are -- we consider

HEMLOCK
ERASABLE

[redacted]

[redacted]

[redacted]

[redacted]

Q [redacted]

[redacted]

[redacted]

[

[redacted]

Q Was there [redacted]

A It specifically provided that

A Yes. I was particularly concerned [redacted] the receipt showed that it was [redacted]

and if I could--I am not sure that I am [redacted] but it was a couple of my concern [redacted] is on of the receipts I got the check saying that it was [redacted] with the check--to be perfectly [redacted] check given in payment of this invoice--this invoice, no, in payment to you, something like this.

Because everybody thought that the money was [redacted] there to escape--to guarantee the agency that the money was available for use in the campaign. That the problem was one of committee; that it was a matter of having a check available instead of cash. However, the Agency preferred cash.

So, they were willing to wait. The problem, as I was told later on, was that the waiting time was not one they could afford; [redacted] they had a deadline to pay the media. And that was the only problem that came out later on.

HEMLOCK
ERASABLE

[redacted] in the political campaign of Puerto Rico, I had [redacted] I had to deliver two hundred thirty thousand dollars to the committee agency. Which he did succeed to handle but to give you the problem involved.

Oh, buddy, twice o'clock, because they were going to the wire. They did, it's like a bidding and they buy time; this program I buy the thirty minutes on this program and so forth.

I came to these people and said, I have one hundred thousand dollars here. This on forty-eight hours to get you the one hundred fifty thousand dollars. And they flatly say no. And I had to give the one hundred fifty thousand dollars the same day.

But this is not A lot of problem and a lot of efforts. But I bet--there is no flexibility, there is no possible flexibility in that because time is of essence. I mean this is a matter of time.

Probably the agency went into the position that

HIGHLIGHT
ERASABLE
COTTON CONTENT

[illegible]

[illegible]

[illegible]

[redacted]

A [redacted]

[redacted]

A [redacted]

[redacted]

(Off the [redacted]

[redacted]: (Speaking)

Q [redacted]

[redacted]

A It's a very [redacted]

MR. [redacted]: That [redacted]

THE [redacted]: Outside of the hearing.

A No, not [redacted] but [redacted], by itself, was very common in terms of the [redacted] neighborhoods.

But as a group, I don't [redacted]

[redacted]

Q Do you have a [redacted]

A Luis [redacted]

Q A. Rivera.

A [redacted]

Q Luis A. Rivera.

A Like angel? A like eagle, Luis A. Rivera?

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

A. Well no. As a matter of fact, I don't know the organization. If I remember a name, I could be mistaken terribly.

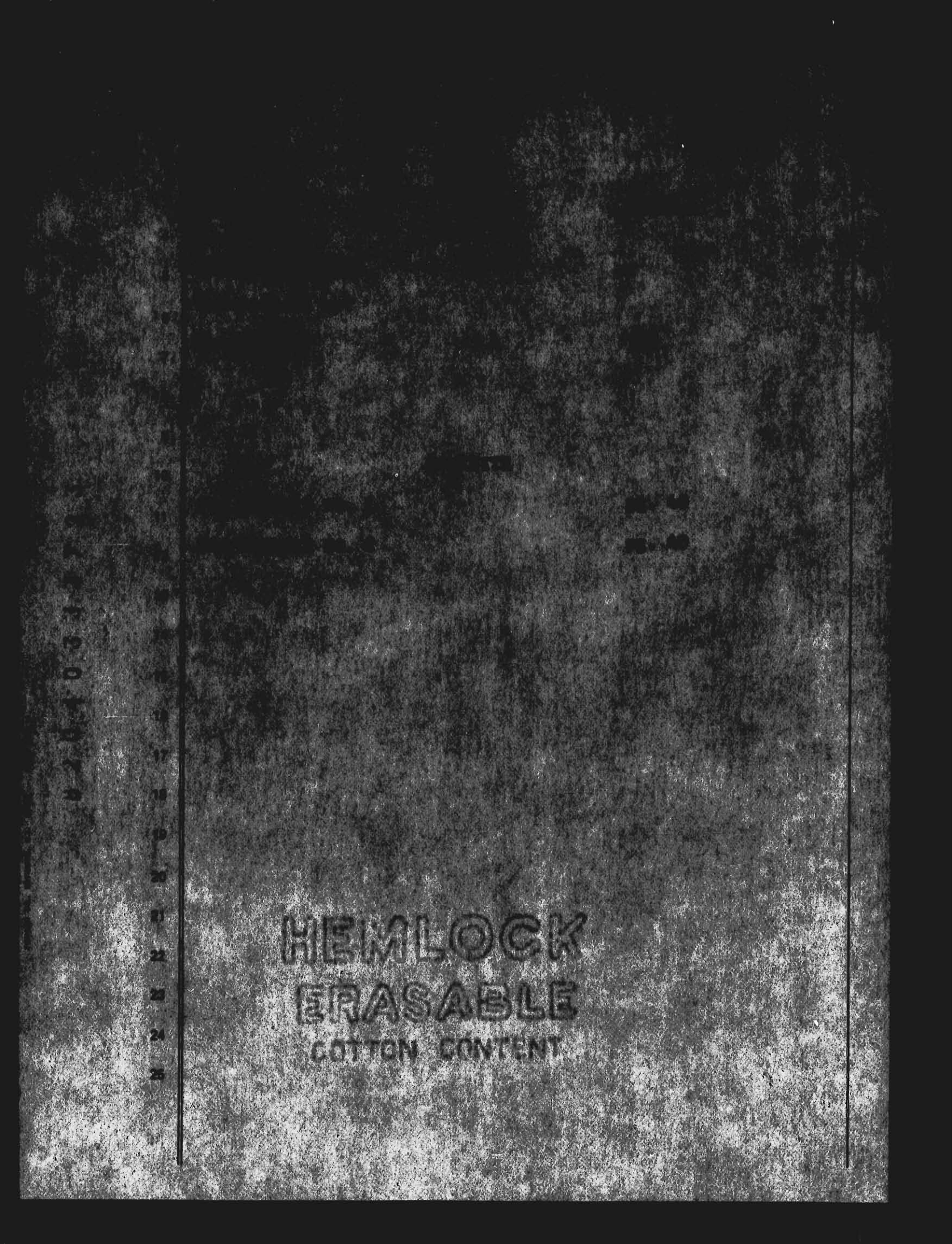
(Off the record.)

MR. [redacted]: No further questions.

MR. [redacted]: I have no questions.

MR. [redacted]: Okay.

(Whereupon, the deposition was terminated and the witness excused.)


HEMLOCK
ERASABLE
COTTON CONTENT

[illegible]

[illegible] I am employed by [illegible] as [illegible] in the [illegible] County, [illegible] and that I am familiar with the facts and circumstances hereinafter set forth.

That the foregoing proceeding is a fully, true and correct record of the proceedings in the aforementioned matter.

That I am not of counsel or attorney for either of the parties to said matter, nor in any way interested in the outcome of the cause named in said caption.

Olivia D. Gibbons

OLIVIA D. GIBBONS

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

[redacted]

[redacted]

0 2 0 4 0 3 3 7 2 6

FEC Exhibit 1

FEC Exhibit
ORR 5-5-81
Q6

SWORN STATEMENT

I, MIGUEL A. RIVERA, of legal age, lawyer, married and a resident of Guaynabo, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above-mentioned.

2. That during the month of March, 1980 the Kennedy For President Committee organized various fund raising activities.

3. That one of these activities was an island-wide radio marathon. Radio marathons are a customary method of raising funds for political candidates in Puerto Rico. Usually, starting sometime prior to the marathon, various campaign workers will solicit contributions from individuals throughout Puerto Rico. On the day of the marathon all these contributions are brought to a central location. Further on the date of the marathon, contributions are solicited from individuals on the streets.

4. That the amount collected during the island-wide radio marathon for Kennedy for President Committee was $99,230.33 in cash and checks payable in cash for small amounts from individuals.

5. That no contributions in cash was received from any individual that was in excess of $50.00 or in cash checks.

6. That out of the amount raised from the radio marathon, $88,230.33 was paid in cash to Ileana, Lopito and Howie, an advertising agency, for radio and television commercials. Further, $11,000.00 was paid by money order to David Sawyer for film production cost.

7. That the Puerto Rico Kennedy For President Committee had an agreement with the National Committee that funds raised locally would, whenever possible, be returned for the use of the local campaign.

8. That during the final days prior to the Presidential Primary in Puerto Rico, there was not sufficient time to send the locally collected contributions to the National Headquarters in Washington and receive the return of those funds. Further, Ileana, Lopito and Howie and David Sawyer required the Kennedy

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For President-Puerto Rico Committee to make deposits and/or pay in advance for all media cost.

9. That in order to have the services of Ileana, Lopito and Howie and David Sawyer, prior to the Presidential Primary in Puerto Rico, it was necessary to make deposits and/or pay in advance for media cost.

In San Juan, Puerto Rico, this 25th day of November, 1980.

Miguel A. Rivera

Affidavit No. 388

Sworn and subscribed to before me by Miguel A. Rivera, of the personal circumstances above stated, to me personally known this 25th day of November, 1980 at San Juan, Puerto Rico,

ABOGADO NOTARIO

NOTARY PUBLIC

FEC Exhibit 3

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260

# invoice

FEC exhibit 3 55-84 OC

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | Ck # 12 | (5,000.00) |
| | | Ck # 17 | (1,266.00) |
| | | Ck # 1A | (12,176.00) |
| | | | 150,520.33 |
| | | Ck # 2A | (23,790.00) |
| | | | 126,730.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 1= | 5,000.00 |
| | | # 17 | 366.00 |
| | | # 1A | 12,176.00 |
| | | # 2H | 29,746.00 |
| | | # 5H | 10,000.00 |
| | | | 116,730.33 |
| | | ck # 5A | <12,000.00> |
| We certify that this amount is correct and has been paid in full. | | | 104,730.33 |
| | | ck # 4H | 4,000.00 |
| | | | 100,730.33 |

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | | ck # 12 | (5000.00) |
| | | ck # 17 | (1266.00) |
| | | ck # 1A | (12176.00) |
| | | ck # 2A | (23,790.00) |
| | | ck # 5A | (10,000.00) |
| | | | 116,730.33 |
| | | ck # 6A | (4 000.00) |
| | | | 112,730.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

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JOB Production & Media Campaign

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| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | - ck # 12 | (5,000.00) |
| | | ck # 17 | (1,266,00) |
| | | ck # 1A | (12,176.00) |
| | | ck # 2A | (23,790.00) |
| | | | 126,730.33 |
| | | ck # 3A | (10,000.00) |
| | | | 116,730.33 |

We certify that this amount is correct and has been paid in full.

(Julia Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

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DATE March 17, 1980

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|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5 000.00) |
| | | ck # 17 | (1 266.00) |
| | | | 162,696.33 |
| | | ck # 1H | (12, 176.00) |
| | | Balance | 150,520.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

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DATE March 17, 1980

CLIENT Kennedy For President - Committee

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| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5,000.00) |
| | | | 163,962.33 |
| | | ck # 17 | (1,266.00) |
| | | | 162,696.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

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|---|---|---|---|
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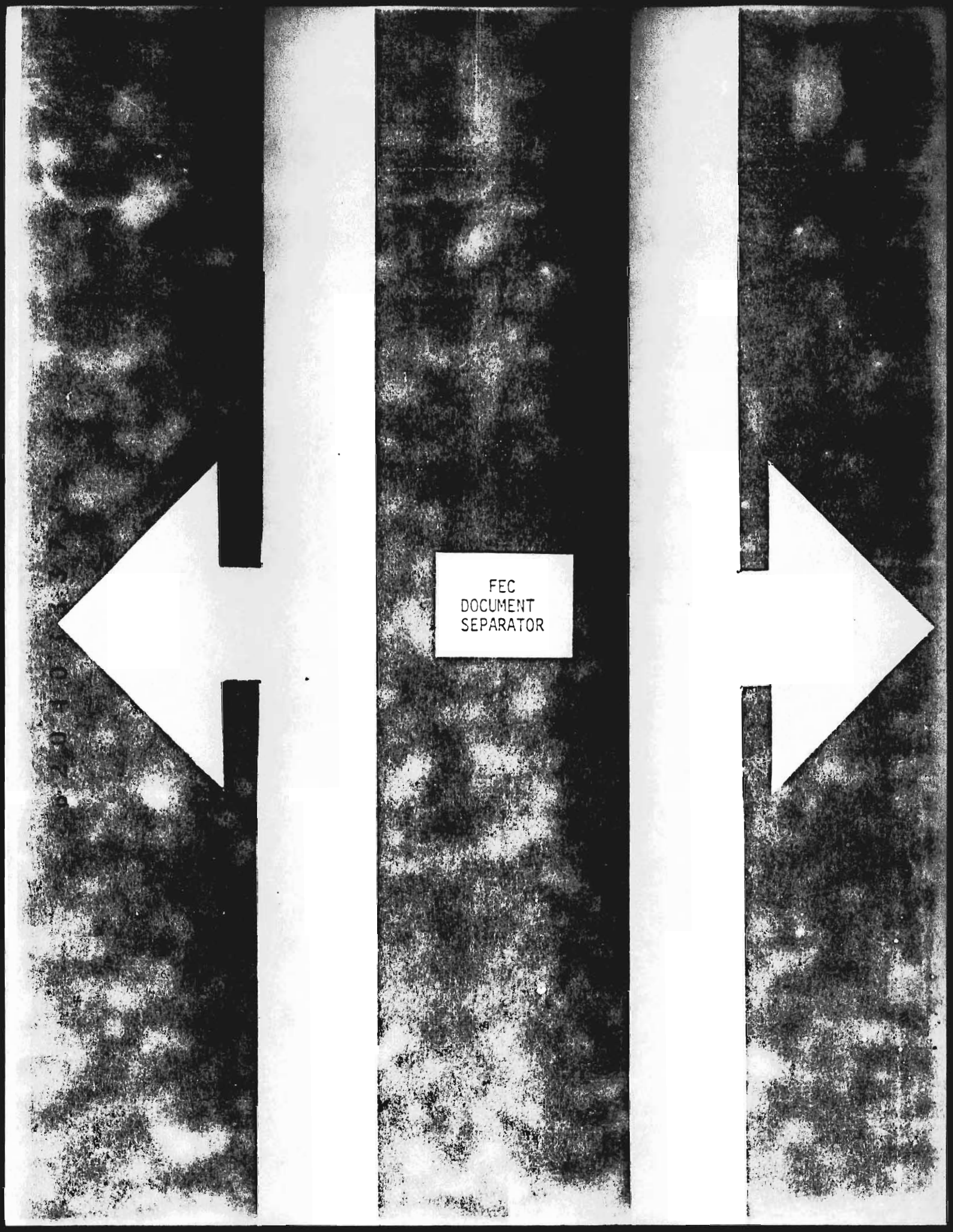
| | Cli 12 | Payment | (5000.00) |
| | | Balance | 163,962.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.


FEC
DOCUMENT
SEPARATOR

[redacted], the deposition of the above-named deponent was taken on the 6th of May, 1961, at the office of the U.S. Attorney, Federal Building, [redacted], Puerto Rico.

HEMLOCK
ERASABLE
COTTON CONTENT

APPEARANCES

MARSHA G. GENTNER, ESQ.
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For Deponent

WALLY DE LA ROSA, ESQ.
Calle Mayaguez 70 2-B
Hato Rey, Puerto Rico

Notary Public

Paramesh: R.J. McConnie

Interpreter

* * * *

0 2 0 4 0 3 3 3 7 3 7

[redacted]

IT IS [redacted]

[redacted] counsel [redacted]

[redacted]

IT IS [redacted]

between counsel for the respective parties hereto that all objections, except as to the form of the questions, are reserved until time of trial.

IT IS FURTHER STIPULATED AND AGREED by and between counsel for the respective parties hereto that the parties shall have a copy of the said after receipt of the transcript thereof any corrections or objections, and that thereafter the transcript may be deemed as true and correct.

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

[redacted]

[redacted]

answer from that [illegible]

DIRECT EXAMINATION

BY MR. [illegible]:

Q Please state your [illegible].

A Julio Medina-Gonzalez.

Q Are you represented by counsel in this action?

A Yes, I am.

Q And what is his name?

A William C. Oldaker.

Q Do you understand that your interest as a witness in this action may not be compatible with that of the Kennedy for President committee?

MR. OLDAKER: Objection.

Q Who is paying your legal fees in this action?

MR. OLDAKER: I will object to that and instruct him not to answer.

HEMLOCK
ERASABLE
CAUTION: DO NOT COPY

Q [redacted]

A [redacted]

Q What's your telephone number?

A I have an office number.

Q What?

A 736-7368.

Q And what is your occupation?

A I am the assistant of the general accountant.

Q And who do you work [redacted]

A Lopito, Ileana & Hertz, [redacted]

Q How long have you worked there?

A Four years.

Q What's your position during the months of January 1980 through April - through May of 1980?

A The same.

Q What are your responsibilities and your daily functions as the assistant to the general accountant?

HEMLOCK
ERASABLE
CONTENT

[illegible]

A [illegible]

Q [illegible]

A [illegible]

Q [illegible]

[illegible]

A [illegible] publicity, as in [illegible] radio and television available) the phase, [illegible] television productions [illegible] of advertisements and everything that is related with management, I mean, with publicity.

Q In other words, you develope the actual production, the advertisement itself?

A Yes.

Q And then you actually arranging for the time to be broadcast at the radio or t.v. station?

A Yes, exactly.

Q I would like to discuss a little bit the customary relationship that you have with the

HEMLOCK
ERASABLE

[illegible]

[illegible] HEMLOCK, [illegible]

[illegible] ERASABLE [illegible]

[illegible] COPPN CONTENT

[illegible]

[illegible]

[illegible]

[illegible] ...ment to do on a particular client, [illegible] ...what sort of the job they may have done before? [illegible] ...how extensive an engagement, things like that.

A. Yes, I would look at that through the services available.

Q What do you mean, "services available"?

A Well, credit information is given to us by private companies that take care of those matters.

Q Dunn & Bradstreet?

A Yes.

Q Do you obtain a financial statement from the client?

A Not all the time.

Q Sometimes?

A Sometimes.

Q Does it depend on whether you have had an ongoing relationship with the client or the nature

MEMOREX ERASABLE OPTION CONTENT

R 2040 3 3 7 4 4

[illegible] and [illegible]

A Yes, [illegible] sure.

Q [illegible] for about [illegible]

[illegible] for the first [illegible]

[illegible] type of [illegible]

[illegible] presence of the billing by [illegible]?

A Yes, depends on [illegible] if it's radio or if it's television.

Q Okay.

If you were supplying radio serving, for instance, a t.v. spot or a radio spot, how would you arrange the billing of that?

MR. OLDAKER: If I might, billing by whom, Mr. Gross?

MR. GROSS: By Legito.

MR. OLDAKER: To who?

MR. GROSS: To the client.

MR. OLDAKER: To the client?

HEMLOCK
ERASABLE
CUTTING EDGE

D 2040 7

[illegible]

[illegible]

[illegible]

A Yes, the radio or TV [illegible] and then [illegible] bills the client.

Q What is the timing of the [illegible] relation to the [illegible] payment of the [illegible]

MR. CHASEN: Are you talking generally, or about political clients?

MR. CHEW: Right now, I'm asking -- well, I am asking for both. When I say generally, right at this time, I would like an answer as to political and also as to commercial, if they are treated differently.

MR. CHASEN: All right.

THE WITNESS: Private clients, we always wait until they bill us. But when they are political clients, we have to bill them first before rendering the services because the stations bill us first. They want advance payment. They require it.

HEMLOCK ERASABLE CARBON PAPER

[redacted] you call [redacted]

[redacted] same in originally setting up

a trust a situation or a financial arrangement.

A [redacted], but not when he is going to buy

[redacted].

Q Okay.

Is that the only difference in the way you treat political spot work [redacted] private accounts?

A Yes. Yes, we always admonish them about it.

Q You always admonish or warn the political committee?

A [redacted] person that comes to see us, because that's the requirement of the media.

Q When you say a private client, what would be an example of a private client?

A Well, the Chase Manhattan Bank, Budweiser, Triple S and so forth.

Q Explain to me how advances work when you

HEMLOCK
ERASABLE
COTTON CONTENT

[illegible]

[illegible]

[illegible]

[illegible]

Q [illegible] we have all [illegible] checks. We have also [illegible] which [illegible] has replaced.

Do you have any [illegible] of keeping [illegible] on deposit?

A No.

Q Do you ever have an [illegible] account set up with a particular client?

MR. [illegible]: You are talking about as general practice?

MR. GUESS: Yes.

THE WITNESS: None Political clients you mean?

BY MR. GUESS: (resuming)

Q Yes, as far as all my questions are concerned. If there is a difference between commercial and political, I'd like you to indicate that.

HEMLOCK ERASABLE BOTTOM CONTENT

[illegible]

Q [illegible]

[illegible] you set up any sleeper accounts, have a political or [illegible] client?

A Not for the [illegible].

Q Did you [illegible]?

A Well, let me see if we did or not. There was some money pending, which was reserved for that. If they gave us an advance, we reserved it -- we separate it until the rest of the money arrives.

Q And you've done this in a few instances?

A No.

Q How many times have you done it?

A It is not the politics of the agency. Maybe for a political campaign.

Q How many?

A We've only made two, three campaigns. Not more than that.

Q So you have only had, in the history of the company, Lopito, three political clients?

HEMLOCK ERASABLE CARTRIDGE

[redacted]

MR. GROSS: I will rephrase the question.

BY MR. GROSS: (resuming)

Q If the funds are held in a bank account on an escrow arrangement, who would have control of the bank account?

A The control you mean?

Q The control. Who would have the right

[illegible]

A [illegible]

Q [illegible]

as an account such as that?

A [illegible]

Q [illegible] other types of checks [illegible] have you [illegible] money was [illegible] checking?

A I don't remember [illegible]

Q In other words, the only type of checks [illegible] that you can recall was one that entailed depositing money into a bank account?

A Yes.

Q What form do you usually receive payments? Is it in the form of a check or cash or something like that?

A For private clients or for political clients?

Q If there is a difference, state the difference in each case, please.

HEMLOCK ERASABLE

A For [illegible]

Q For both, for commercial [illegible]

A Well, if it's the client [illegible]

[illegible] check.

Q Does [illegible] or corporate [illegible]

A Yes.

Q And for a political client?

A It could be a check from the committee or a bank check.

Q Would you take a check from the committee account that was not a bank check or a cashier's check?

A Cash check.

It depends on the financial status of the committee.

We verified, first, with the bank. If there is sufficient funds, then we would.

Q Well, how would you ascertain the

HEMLOCK
ERASABLE
OPTION CONTENT

financial status of the committee besides checking with the bank? Would you - -

A Well, it depends on the people that integrate the committee.

Q So you don't do any kind of financial check as if you would do in a commercial institution?

A No.

Q So, if I understand you correctly, when it comes to determining the credit worthiness of a political committee, the important factors are the individuals who you are dealing with in the committee, and the present state of a bank account, if you are checking on funds at a particular time?

A Basically, the people that make up the committee. And in a second standpoint, the financial status of the account. If it's a person that is well known in the community, then one knows who to turn to.

Q Are there any other factors that you would look at?

A No, that would basically be all of them.

Q You mentioned that you received payments in checks and cash.

Do you ever receive payments in any other

8204033754

[redacted]

[redacted]

[redacted]

[redacted] long?

A I have been there [redacted] years.

[redacted] that we have rendered [redacted] because they have informed [redacted]

Q Okay.

So, do you [redacted] the legal service was provided to [redacted]?

A I'd have to look on the records.

Q But it was before you started working with the company?

A Yes.

Q And since you have been working with the company, you have represented the PDP?

A No.

Q No.

You have not?

A No.

Q Your representation of the PDP was before

HEMLOCK
ERASABLE
CORTION CONTENT

[redacted]

[redacted]

[redacted]

[redacted] (reporter)

[redacted]: Is that the only political event that you have dealt with?

A Yes, that's all.

Q When were you first contacted by a representative of the Kennedy for President Committee, Puerto Rico?

A Nobody contacted me directly. I only dealt with payments and receipts.

Q Do you know who the organization was contacted?

A One of the directors. I don't know which of them both.

Q Who are the directors?

A Efrain Lopez, Jorge L. de Jesus and Ileana Font.

HEMLOCK
ERASABLE
CONTENT

A Yes.

Q [illegible]

with either an official of the Kennedy Committee

[illegible]

Q [illegible] remember whether it was in

[illegible] or in 1979?

A Yes, it was in 1980.

Q Early in 1980?

MR. OLDAKER: By early, do you mean in the first quarter?

BY MR. GROSS: (resuming)

Q Do you remember in what month?

A We started billing them around late February; maybe middle of February, probably.

Q And that was the first time you remember dealing with anything concerning the Kennedy Committee?

A Yes.

Q Did you ever have any direct contact

HEMLOCK
ERASABLE

[illegible]

A I only [illegible]

[illegible] money or some [illegible]

Q Who would [illegible]?

A Well, there were two of [illegible]

Q [illegible]

Lowell, Simms. I [illegible]

the things [illegible]. I dealt mainly with those [illegible]

Q There was one other person that was [illegible]

[illegible]

A I don't remember the other [illegible]

Q But there was one other person?

MR. OLDAKER: Possibly more.

THE WITNESS: Well, possibly more.

BY MR. [illegible]: (resuming)

Q Possibly more.

Did you deal with Victor Gutierrez?

A No, not directly.

Q Did you meet with these individuals in person or on the telephone?

HEMLOCK
ERASURE
CUTTING

[redacted]

[redacted]

[redacted]

[redacted]

[redacted]

A [redacted] had to keep [redacted]

[redacted] would be [redacted] paid [redacted] would be [redacted].

Q What type of direct [redacted] [redacted] have [redacted] Laxalt?

A He would [redacted] and bring me [redacted] money, [redacted] in checks; the [redacted].

Q And it was strictly concerning the [redacted]? Did you discuss anything else with him other than payments?

A No, just the payments.

Q Do you remember about when that was in time?

A Now, it was late October, or early March. Excuse, late February, excuse me. Late February, early March.

Q Was Senor Laxalt the first individual that you remember meeting from the Kennedy committee?

A I think so.

Q By the time that you had met with Senor

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

Q [redacted]

whether there was a [redacted] and that there was not [redacted]?

A [redacted] if there was or there wasn't.

Q Were you informed of any of the terms and conditions of the arrangement with the Kennedy committee, and if so, who informed you of this?

MR. [redacted]: You mean, as terms set in time of payment?

MR. [redacted]: Any term whatsoever as far as the arrangement with the Kennedy Committee.

THE WITNESS: I don't know which one of the two directors informed me about it, but I was effectively informed that we would carry forth the procedure of advance payment.

HEMLOCK
BRASAELE
CONFIDENTIAL

[redacted] letters indicating

[redacted]

A [redacted]

Q [redacted] you don't remember which one?

A [redacted]

Q Was that the only thing or the only term or condition of the arrangement with the Kennedy committee that you were informed of this advanced billing procedure?

A Yes.

Q And you done business before with any of the principals in the Kennedy committee?

A I don't know.

Q And you were not familiar with Senor Lausell from a business standpoint, and Senor Rivera?

A No, I used to know them before as private citizens.

Q As private citizens, but not from a business standpoint?

HEMLOCK
ERASABLE
COTTON CONTENT

A Yes.

Q So there was no [illegible] to the Kennedy committee at any time?

A No.

Q Was there any discussion about running any [illegible] Kennedy committee?

A We only discussed that we would buy the time, and we would let them know how much that would be and he would make the payments.

Q Is the only service that you provided to the Kennedy committee buying t.v. and radio spots or were other services provided?

A And the press as well.

Q And the press.

Did you do any production work for the Kennedy committee?

A Yes, I think we did some, a radio spot, music. Yes, a jingle.

Q A jingle.

HEMLOCK ERASABLE

[redacted]

Q [redacted]

[redacted]

Q [redacted]

committee of providing?

A Yes.

Q Do you recall any discussions about setting up escrow accounts with the lawyers [redacted] specifically for?

A No.

Q [redacted] there any discussions that you were involved in, about the form in which payments would be made from the Kennedy committee?

A No, only that there would be payments made in advance.

Q When I say, "form," I mean, by check

HEMLOCK
ERASABLE

A No, I [illegible] with them, I don't.

[illegible]

[illegible] contributions coming through bank accounts.

MR. GROSS: I see. Thank you.

BY MR. GROSS: (resuming)

Q Do you know who would carry on those discussions, specifically within Lopite, about the source of funds for paying of services?

A No, I don't know.

Q Did you ever discuss the radio services with any of the individuals of the committee?

A No.

Q Was there ever any discussion or were you ever informed of any discussions about payments for services having to come from the Washington, D.C.,

HEMLOCK ERASABLE CAUTION CAUTION

[redacted]

Do you remember the dates between which [redacted]

[redacted]

No, we would have to check upon the [redacted]

[redacted]

[redacted] Exhibit One.

MR. OLDAKER: Would you identify the [redacted]

[redacted]

[redacted] it's dated a through

SS, and these are invoices on a Lopito, Ilsamo & Howie, Inc., stationery or letterhead.

MR. OLDAKER: Dated February 1st 1980 through March 17th 1980.

THE WITNESS: Yes.

HEMLOCK
ERASABLE
COTTON CONTENT

A Yes.

Q In the

of Robert Lovinger?

A Yes.

Q Were you

A

Q They were delivered under your supervision?

A Yes.

Q And were they delivered to the Kennedy committee or were they mailed to the Kennedy committee? How were they transmitted?

A By hand. Some of them were taken hand

HEMLOCK
ERASABLE

[illegible]

A [illegible]

[illegible]

Q [illegible]

A Yes, [illegible]

Q [illegible]

A 1980; could be, could be not.

Q You are not sure whether in the Logico files, whether these invoices are still around?

A They could.

Q Would it be standardized practice to keep receipts of delivery at least one or two years?

A The most we could keep them is a year. If not, we would have a room full of files.

Q You don't have any kind of microfilming procedures for this?

HEMLOCK
ERASABLE
CONTENT

[redacted]

[redacted]

[redacted]

[illegible]

[illegible]

[illegible]

[illegible]

for the [illegible]

[illegible]

[illegible]

[

light. I'll [illegible]. Let

simply say I am trying to clarify it.

BY MR. [illegible]: (Speaking)

Q [illegible]

go to Alberto [illegible]

A [illegible]

part of that went to Alberto Martinez.

Q So part of it went to Perico and part of it went to the radio stations?

A That is correct.

Q When you advance money to a radio station, do you have to advance the entire payment, or can you advance a partial payment?

A Total payment.

Q Total payment?

A Yes. Some radio stations request this one before the other. It depends with whom you are dealing with.

MEMLOCK
ERASABLE
COTTON CONTENT

radio" involved?

A No.

Q [illegible] three?

A [illegible] They are here.

Q And [illegible] the radio stations that are [illegible]

A Yes.

Q [illegible] of this [illegible] One.

That is only part of the radio stations, I would assume.

A Yes, that's only part of them.

Q And there were additional ones?

A Well, I don't know if there were

HEMLOCK
ERASABLE
CONTENT

[redacted]

Q [redacted]

A [redacted]

Q [redacted]

A [redacted]

Q [redacted]

A [redacted]

Q [redacted]

A [redacted]

Q [redacted]

A [redacted]

Q In other words, is it your deliverable and then dated at a later date?

A No.

Q Do you know at what time all the payments on this first invoice were paid by what time?

A No, it must have been before February the 4th, but I couldn't precise the date.

Q When you signed this invoice, you certified that no payments have been made?

A Exactly.

MR. OLDAKER: It further states that it

A Yes. [illegible]

Q [illegible]

So that [illegible] service of [illegible]

[illegible]

Q [illegible] the balance of this invoice [illegible]

[illegible] signed the invoice on February 1st, or on or about February 1st, 1988?

A Yes, I believe so.

Q If you would, please turn to Ex. 1 of the Exhibits.

MR. OLDAKER: Could you give us the invoice number?

MR. GROSS: The invoice number is 3800001.

BY MR. GROSS: (resuming)

Q This invoice states that one hundred sixty-eight thousand nine hundred sixty-two dollars and thirty-three cents was paid in full and is correct.

DEMLOCK ERASABLE

17th. I wouldn't call you any [illegible].

Q [illegible] days before or after?

A [illegible] 17th. It could have been one or three days before.

Q Thank you.

Did this include the eighty-eight thousand dollars in cash that was delivered?

MR. OLDAKER: I will suggest for the record that some foundation be laid for that question.

MR. GROSS: Well, I am going to go into several questions about the marathon.

MR. OLDAKER: Why don't you ask if he

HEMLOCK
ERASABLE
COTTON CONTENT

[redacted]

Q [redacted] you [redacted]

[redacted] handwritten entries on [redacted]?

Did [redacted] those [redacted] on [redacted]?

A [redacted]

Q [redacted] you know [redacted]

[redacted]?

A Judging from the information that's there, they seem to be check numbers, but I don't know who put them there.

Q Except for those handwritten entries on this invoice, is this an exact copy of the previous invoice?

A Yes.

Q Did you ever see these handwritten entries on here before this time?

UNOFFICIAL DOCUMENT
ERASABLE
COTTON CONTENT

[redacted]

[redacted]

[redacted]

Q Do you know whom with the Kennedy campaign?

A No.

Q Did someone in your company ask you to do this?

A [illegible] but since I signed the invoices.

Q Well, did someone directly from the Kennedy Committee ask you to execute this document or did someone within the company ask you to sign it?

A One of the company officials.

Q Do you know whom?

A No, I don't.

HELMSLEY
ERASABLE
CONTENT

[redacted] I object on the

[redacted] and instruct the witness not to

[redacted]

BY [redacted]: (resuming)

Q [redacted] Mr. Hernandez representing Leipo

[redacted] the [redacted]

[redacted] other objection as to

attorney-client privilege.

I am instructing him not to answer.

BY MR. GROSS: (resuming)

Q Was Mr. Hernandez representing you when he drew up this document?

A Yes.

HEMLOCK
ERASABLE
CUSTOM CONTENT

Q Did you have any discussions with Mr. Hernandez about this affidavit?

A No, just to give him the amounts.

Q Was Mr. Hernandez representing the Kennedy committee also, when this affidavit was drawn up?

MR. OLDAKER: What - -

THE WITNESS: Not that I know of.

MR. OLDAKER: For the record, I can see no possible relevancy in any of these questions.

If attorney Hernandez was representing Mr. Morales, that is the only relevant question.

MR. GROSS: Well - -

MR. OLDAKER: Who his other clients were at the time would be non-applicable.

MR. GROSS: I wouldn't argue the point of relevance at this point, since that was waived at the beginning of the deposition.

I would like to enter this affidavit as part of the record.

Thank you.

THE ABOVE MENTIONED

A [illegible]

Q [illegible] and what was [illegible]

[illegible]

[illegible]

Q What was [illegible] that he signed?

A Around March 15th, between [illegible]th and the 16th of March according to the invoice, that is.

Q How many payments in cash did you receive?

A A few.

Q A few.

Between what dates were the cash payments?

A If I don't remember wrong, between the 15th and the 9th.

Q So from what you can recall, the few cash payments that were made were made between the 9th and the

Q

A Yes, [illegible]

Q [illegible]

A [illegible]

Q [illegible]

A [illegible]

Q [illegible]

A

[redacted]

Q I understand. It's approximately in that area.

A Yes.

Q [redacted]

A Who brought it to me?

Q [redacted]

A I don't know if it was Lassell or Rivera or any other person [redacted] with the committee.

Q Could it have been both of them?

A Yes, could be. I mean, that's quite a gross amount.

Q Yes, it is a large amount.

And, however, you don't remember, specifically,

HEMLOCK
BROADSIDE

[redacted]

of the bills? Was [redacted] any particular type of bill [redacted] the case?

A Ten or twenties. Twenty was the largest denomination.

Q [redacted] was there change; coins?

A [redacted]

Q [redacted] how much in coins?

A No, I don't know how much.

Q How were the coins delivered? Were they in the suitcase also?

A Yes.

HEMLOCK ERASABLE

Q Was it all packaged in different amounts?

A Yes, I remember.

Q And the coins were packaged?

A In packs.

Q I am sorry?

A In packs.

Q In packs.

Q Were the coins rolled?

A Yes, they were rolled.

Q Were you informed as to where this money had come from?

A Not directly. I knew they were going to have a radio marathon.

Q So you understood, at the time, that these were proceeds from the radio marathon?

A Yes.

Q Was all the money that was delivered, as part of the marathon money that was coming to you, in the form of cash or coins?

A I don't know if it was all coming from the radio marathon, but all the money they brought was in cash and coins.

Q Were there any checks?

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Q [illegible]

A [illegible]

Q Yes.

A [illegible]

[illegible] were [illegible] that day at [illegible] about with [illegible] for [illegible]

A No.

Q Did you have any [illegible] with the individuals of the Kennedy committee when these funds were delivered?

A No, we just counted the money and we verified.

Q So, Senor Lausell and Senor Rivera, as you recall, and yourself, counted the money.

Did you talk about the radio marathon?

A Well, we talked about nothing that had specifically to do with the offices.

MEMOREX ERASABLE

[redacted]

BY MR. [redacted]:

Q Well, [redacted] there [redacted]

[redacted]

A [redacted] who were helping me [redacted]

Q So there were two employees or [redacted] employees?

A Just one.

Q Just one.

Do you remember on any occasion, [redacted] had been there together on any one occasion?

A You mean besides that day?

Q On that day or any other day.

A They could have been together.

Q On a few occasions?

HEMLOCK
ERASABLE
CONTENT

[redacted]

Q Was there any indication after [redacted] what [redacted] did you have about when cash coming in? Did they indicate how much more cash might be coming in as these payments were made?

A No.

Q Did you expect to be paid in cash?

A [redacted] expected. But since it was [redacted] campaign, I mean, we had to speed things up.

Q So before the Kennedy representatives came in with this cash, you did not know that you would receive any payments in cash?

HEMLOCK
ERASABLE

A [illegible]

Q [illegible]

A I don't remember if [illegible]

[illegible] I don't remember right now.

Q [illegible] receive large amounts of [illegible]

[illegible], and do you give them any kind of [illegible]

to sign the receipt?

A Yes, we usually have [illegible] receipt.

Q If you did have to [illegible], would you

[illegible] copy of that additional [illegible]?

A No, because we give it to them, we keep

[illegible] money.

Q You don't make a copy of the receipts

[illegible] give it to them?

A No, not at that time.

Q Not at that time?

A Not that I know of; that I remember.

Q What did you do with the money after you

counted it?

A It was deposited in the bank.

HEMLOCK
ERASABLE
CARBON PAPER

[redacted]

A [redacted] radio, television, and [redacted]

Q So this was all for [redacted]?

A Yes.

Q Was the [redacted] provided concerning the radio [redacted]?

A Not that I know of. I would have to check on the record. I don't think so.

Q [redacted]

A [redacted] It may have been done by [redacted]

Q I am sorry. What do you mean you didn't do it yourselves?

A Let me check if there was any made.

Q Okay.

A Possibly the same jingle may have been

HEMLOCK
ERASABLE
COTTON CONTENT

Q [illegible]

A We could have [illegible]

we bought [illegible] the [illegible]

[illegible] public [illegible]. They could have happened.

Q I see.

[illegible] the [illegible] changed [illegible], did you call [illegible] the committee, or did the committee call you to tell you that that money would be coming in the form of cash?

A [illegible].

Q In any of the incremental payments, no one called or there was no telephonic or written communication telling you that it would come before it arrived?

A No.

Q How did you determine how much in services would be provided for this precise amount that was delivered in cash?

A When we buy the media service, that's press, television or radio, they supply us with the

HEMLOCK
ERASABLE
CARBON CONTENT

[redacted]

Q [redacted]

A [redacted]

Q [redacted]

[redacted]

[redacted]

[

[redacted]

MR. [redacted]: Political [redacted]

MR. CROSS: Political [redacted]

[redacted]

MR. CROSS: (resuming)

Q. In the public record [redacted] at the Federal Election Commission, there is an expenditure that was made on March 12th, 1980, in the amount of seven thousand and [redacted] dollars to Inpito, Ilsana & Howie from this group, "Defensores de la Democracia."

[redacted]: What's the date?

MR. CROSS: March 12th, 1980.

BY MR. CROSS: (resuming)

Q Does that - - and it was for t.v., radio and advertising, or t.v. time and advertising. Does that help you recall dealing with any - - with the group with that name?

HEMLOCK
ERASABLE
COTTON CONTENT

A I would have to go to the records and check you counted out the money, you talked about when you said Q The treasurer of that group is a man named Luis A. Rivera. I realize that is a common name, but do you remember dealing with a Luis A. Rivera? office. A Not that I - - I don't know. I have dealt with quite a few Riveras. I don't remember the names. A Orealis Orama.

Q MR. GOLDAKER: I would ask that a copy of that report be attached to the record. You don't copy of the FEC records report, to what Mr. Gross was referring to.

MR. GROSS: I have no further questions at this time.

DIRECT EXAMINATION (continued)

BY MS. GENTNER:

Q If you check your records back at Lopito, would you be able to find out how many cash payments you got, in what amounts, and approximately what dates?

A Well, we can check the record. We can check if we have the copies there.

Q But, do you think you would have any records on this that would reveal that?

A Cash deposits, we're supposed to have them as far as I know.

0204033337995

A

[illegible] didn't have a copy.

Now, for Logitek you invoice customers, did you record or acknowledge that the eighty-eight thousand dollars had been paid, so that it would be referenced later on on an invoice? Then the record would be accurate that the [illegible] had been paid, the money had been paid.

A Well, the copies of the deposit slips. Because we rarely receive such large amounts of money in cash. I mean, or small amounts, we always receive our payments in check.

Q And you felt comfortable with that not

HEMLOCK
ERASABLE
COTTON CONTENT

A Yes, because it is also verified with the bank that such an amount had been deposited.

Q You also said that the usual procedure would be that Logico would contact the media, reserve time, [illegible] from the political [illegible] so that it could be paid to the media. But, you said that you were not contacted by anybody from the Kennedy for President Committee and you did not contact anybody from Kennedy For President Committee prior to the eighty-eight thousand dollar cash payment.

So, I am wondering what prompted them to

HEMLOCK
ERASABLE
COLTAN CONTENT

[redacted]

[redacted]

[redacted]

MR. [redacted]: I have [redacted]

MR. [redacted]: [redacted]

MR. GREEN: Okay.

MR. GREEN: We will enter this into the record as FBI Exhibit three.

Thank you.

THE ABOVE MENTIONED DOCUMENT WAS MARKED FBI EXHIBIT [redacted] FOR IDENTIFICATION.

BY MR. GREEN:

Q. Mr. Morales, recalling when the cash was delivered by either Mr. Rivera or others from the Kennedy committee, and when you counted that money, do you remember any discussion at that time with regards to holding the cash until the checks would be delivered

HEMLOCK
REDACTABLE
OPTION CONTENT

not it was merely Mr. Rivera who brought the cash or Mr. Rivera and Mr. Lansell? Could it possibly have been only one of them?

A I am not sure if it was both of them.

MR. GROSS: I would note for the record, that you stated clearly before that you received on at least one occasion, both of the individuals; is that - -

THE WITNESS: Where one of them bring up the money, but, I don't know which one.

BY MR. OLDAKER: (resuming)

Q To clarify the record, my understanding of your prior answer was that Mr. Lansell and Mr. Rivera

HEMLOCK ERASABLE

Q [illegible], is [illegible]

that there were three

between [illegible]

MR. [illegible]: I believe [illegible] would show that he indicated [illegible] might have been three or four.

[illegible]: [illegible]

Q It was at least more than two deliveries of cash paid between those dates. And that at least on one of those occasions, you [illegible], Sandy Rivera and Danny Jewell appeared, even though one of them may have actually had the money in their hand, and the other one was at their side. Is that correct?

MR. OLDAKER: I will object to the form of the question.

I would suggest that you ask him what he

HEMLOCK
ERASABLE
CAUTION CONTENT

[redacted]

[redacted]

[redacted]

HEMLOCK
FEASABLE

One other question prompted by the cross.

I asked you before about any conversations that may have transpired at any one of these meetings of delivery of the marathon money. And you indicated that you didn't remember anything specifically other than just extraneous conversation.

Mr. Oldaker indicated that there may have been a discussion about holding money or putting money into - - well, I think it was holding money, was all that you said.

Do you remember any other discussions

could you read it back.

(Question read back by the reporter.)

[redacted] what we agreed upon.

What are you referring to when you say, "separating what we agreed upon"?

A We would say that when they brought the money, they could have brought an amount in excess of the agreed amount. And then, we would separate that amount in excess in order to buy some additional time.

Q Okay.

Bear my indulgence, when you referred to,

[redacted] of person who [redacted]
[redacted] was delivered, or any of [redacted]

A Yes, it's possible.

Q Well, you say it's possible.

You specifically remember that [redacted] in conversations with Kennedy representatives when the comb was delivered;

A Yes, because we could have had an agreement with X amount of radio stations, and then when they come, they could have said, we need two or three more radio stations for you to contract. So, we have to go [redacted].

Q Do you remember discussing that?

A One thing is, I don't deal with media. I only deal with accounting. I receive payment, and make the payments; issue payments to the radio stations.

Q I understand. But, as best as you can recall at this time, when the representatives of the

HEMLOCK ERASABLE OPTIC CONTENT

[redacted]

A I [redacted]

Q Okay.

[redacted]

[redacted]

A [redacted]

Q [redacted]

[redacted]

A [redacted]

MR. [redacted]: Let the record reflect that the witness is conferring with counsel.

THE WITNESS: This other one could be [redacted] the [redacted] the [redacted] the

[illegible]

Q [illegible]

[illegible] for publishing the radio marathon.

MR. [illegible]: I think the question should be, did they have anything to do with the radio marathon, first.

MR. [illegible]: All right.

BY MR. [illegible]: (resuming)

Q Did these invoices have anything to do with the radio marathon?

A No.

Q But you testified earlier, that there may have been certain spots going to the radio marathon, I think you testified that that--

MR. CLARKE: I do not believe that it has been established, that certain spots were bought by Lorillard, Lennen & Howie before the radio marathon.

You might ask that question. Possibly it was, and I didn't get it.

HEMLOCK
ENGAGED
CONTINUED

[redacted]

Q [redacted]

[redacted]

[redacted]

[

[redacted]

A [redacted] I don't think so.

Q [redacted]

A [redacted]

Q [redacted]

A Yes, it could be less.

Q Probably less?

[redacted]

[redacted] you were previously working for special instructions"?

Had you previously ever received special instructions, as you refer to them, from the Kennedy committee?

A It is possible that we could have

HEMLOCK
ERASABLE
CUT ON ENTER

A

[illegible]

[illegible]

[illegible]

[illegible]

[illegible]

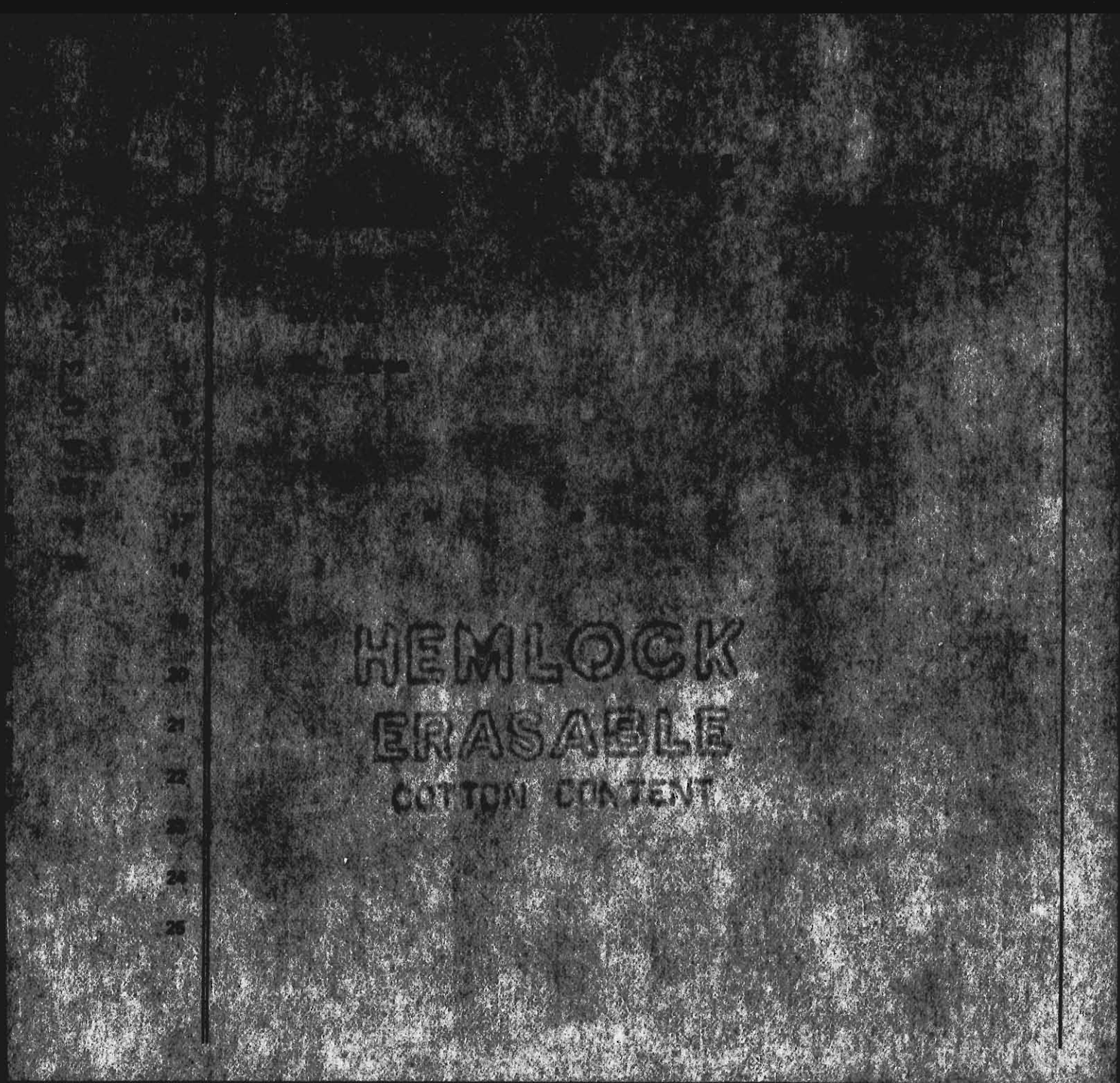
that you got the [illegible] it would be his
[illegible]
[illegible]
[illegible]

MR. CLAYER: I have no further questions.

MR. GROSS: Thank you very much. I have no furtic questions.

* * * *

(Whereupon the deposition was terminated.)


HEMLOCK
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COTTON CONTENT

of the testimony.

[redacted]

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[redacted]

FEC
DOCUMENT
SEPARATOR

FEC B & I a

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-726[illegible]

# invoice

FEC Exhibit One A 56-Pg. O.G.

NO. 2800012

DATE 2-1-80

CLIENT Comite Kennedy Presidente

JOB Producciones y Anuncios - Radio y Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| ALBERTO CARRION<br>JINGLE - KENNEDY | | | $ 5,800.00 |
| OCHOA RECORDING - Cassettes & Cartridges 28941, 28985 | | | 736.00 |
| ANUNCIO PRENSA<br>Produccion y Publicacion | | | 353.00 |
| PRODUCCIONES LAYOUT, MECHANICAL COPIES LETTERING, PHOTOSTATS BROCHURE | | | 788.00 |
| ELMENDORF - PRINTING BROCHURE<br>10,000 OCPIES | | | 3,500.00 |
| CAMPAÑA RADIO<br>FEB 4 A FEB 9 | | | 5,999.00 |
| | | | 17,176.00 |
| Menos pago parcial | | | 5,000.00 |
| Balance de esta factura | | | $ 12,176.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

MEDIA

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 800015

DATE Febrero 8, 1980.

CLIENT COmite Kennedy Presidente

JOB Produccion y Rublicacion Anuncio Prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Arte, Tipografia, mechanical, y publicacion Anuncio en el Mundo y el San Juan Star | | | 1,266.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800001

DATE 2-21-80

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Feb. 22 a Feb. 29/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WQBS - 2 - 30" "Show de la Mañana" | | $ 420.00 | |
| WZNT-FM 7 30" "Lunes a Sabado | | $1,624.00 | |
| WIIQ 5 30" "Lunes a Viernes" | | 810.00 | |
| WAPA 2- 30" "Show de la Mañana | | 192.00 | |
| WLUZ 2 30" "Alegre Despertar y Hoy | | 480.00 | |
| WUNO 2- 30" "Ultima Hora" | | 432.00 | |
| WKVM 2 -30" "Show de la Mañana" | | 288.00 | |
| WBMJ - 5 30" "Lunes a Domingo | | 1,400.00 | |
| WZAR 5- 30" "Lunes a Viernes" | | 360.00 | |
| WPRP 5- 30" "Lunes a Domingo | | 240.00 | |
| COSMO - 5- 30" Lunes a Domingo | | 240.00 | |
| WAEL 5- 30" Lunes a Viernes | | 135.00 | |
| WALO - 5-30" Lunes a Viernes | | 150.00 | |
| WMIA - 5 30" Lunes a Domingo | | 116.00 | |
| WCMN 5 30" Lunes a Viernes | | 120.00 | |
| WUPR 5 30" Lunes a Viernes | | 120.00 | |
| WVJP 5 30" Lunes a Viernes | | 120.00 | |
| WNEL 5 30" Lunes a Viernes | | 180.00 | |
| WKAQ 4 30" Radio Reloj - Combo | | 1,579.00 | |
| WMDD 5 30" Lunes a Domingo | | 240.00 | |
| | | | $9,246.00 |

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 280007

DATE 2/22/80

CLIENT Comite Ke-nedy Presidente

JOB Cargos Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| OCHOA RECORDING STUDIOS | | | |
| (1 tape) #29046 | | $ 11.00 | |
| (2 tape) #28992 | | 20.00 | |
| (25 " ) #29137 | | 250.00 | |
| (20 " ) #29165 | | 200.00 | |
| | | | $481.00 |

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800008

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios - televisión - Feb. 27 a Marzo 4, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ-TV | | | |
| 4-30" - Feb. 27 | | | |
| 2-30" - Feb. 28 | | | |
| 2-30" - Feb. 29 | | | |
| 1-30" - Marzo 1 | | | |
| 3-30" - Marzo 2 | | | |
| 3-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | $6,750.00 | |
| WAPA-TV | | | |
| 3-30" - Feb. 27 | | | |
| 4-30" - Feb. 28 | | | |
| 3-30" - Feb. 29 | | | |
| 1-30" - Marzo 2 | | | |
| 2-30" - Marzo 3 | | | |
| 3-30" - Marzo 4 | | 5,165.00 | |
| III. WKBM-TV | | | |
| 1-30" - Feb. 28 | | | |
| 1-30" - Feb. 29 | | | |
| 1-30" - marzo 3 | | | |
| 1-30" - Marzo 4 | | 1,000.00 | |
| | | | $12,915.00 |

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I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 2800009

DATE 2-28-80

CLIENT Comité Kennedy Presidente

JOB Anuncios Radio - Marzo 3 a Marzo 7, 1980

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - Radio<br>4-30" Radio Reloj | | $1,220.00 | $1,220.00 |

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I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380011

DATE

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA RADIO MARZO 12/ MARZO 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ - 32 spots 30ss Radio Reloj | | $3,300.00 | |
| 2. WQBS - 91 " " | | 1,274.00 | |
| 3. WZNT - 77 " " | | 1,582.00 | |
| 4. WQII - 51 " " | | 1,056.00 | |
| 5. WAPA - 24 " " | | 384.00 | |
| 6. WUNO - 32 " " | | 1,152.00 | |
| 7. WKVM - 12 " " | | 288.00 | |
| 8. WBMJ - 40 " " | | 1,400.00 | |
| 9. WFID - 30 " " | | 420.00 | |
| 10. WIAC - 16 " " | | 288.00 | |
| 11. WZAR - 42 " " | | 504.00 | |
| 12. WPRP - 42 " " | | 294.00 | |
| 13. WOYE - 42 " " | | 252.00 | |
| 14. WAEL - 42 " " | | 189.00 | |
| 15. WMDD - 42 " " | | 336.00 | |
| 16. WALO - 42 " " | | 210.00 | |
| 17. WMIA - 42 " " | | 121.80 | |
| 18. WORO - 42 " " | | 417.90 | |
| 19. WCMN - 42 " " | | 168.00 | |
| 20. WUPR - 42 " " | | 168.00 | |
| 21. WVJP - 42 " " | | 168.00 | |
| 22. WNEL - 42 " " | | 252.00 | |
| 23. WPRM - 42 " " | | 504.00 | |
| 24. WXRF - 42 " " | | 252.00 | |
| 25. WHOY - 42 " " | | 168.00 | |
| 26. WXEW - 42 " " | | 126.00 | |
| 27. WENA - 42 " " | | 189.00 | |
| 28. WX100- 45 " " | | 450.00 | |
| 29. WLUZ - 30 " " | | 540.00 | |
| | | | $16,453.70 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO TELEVISION MARZO 5 A MARZO 11/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV | | | |
| 1-30ss Marzo 5 | | | |
| 2-30ss Marzo 6 | | | |
| 3-30ss " 3 | | | |
| 1-30ss " 8 | | | |
| 2-30ss " 9 | | | |
| 4-30ss " 10 | | | |
| 3-30ss " 11 | | $8,775.00 | |
| II. WAPA - TV | | | |
| 1-30ss Marzo 5 | | | |
| 3-30ss " 6 | | | |
| 2-30ss " 7 | | | |
| 1-30ss " 9 | | | |
| 2-30ss " 10 | | | |
| 2-30ss " 11 | | 4,800.00 | |
| III. WKBM - TV | | | |
| 1-30ss Marzo 2 | | 200.00 | |
| | | | $13,775.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800003

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB PRODUCCION ANUNCIO RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO 30SS - 2 SPOTS | | | |
| EJECUTORES, ESTUDIO, MEZCLA Y SUPERVISION | | 469.72 | |
| 10 CARTRIDGES | | 500.00 | |
| | | | 969.72 |
| OCHOA RECORDING | 29184 | | 46.00 |
| | | | 1,015.72 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800004

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS RADIO Y TELEVISION

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKAQ - TV<br>2 30" MARZO 7 y 14 | | 1,000.00 | |
| II. WKAQ - RADIO<br>44 - 30" MARZO 7, 10 y 11 | | 2,248.00 | |
| | | | $3,248.00 |

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I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380004-A

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB PRODUCCION - RADIO 30 SS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| PRODUCCION ANUNCIO RADIO<br>30SS - 2 - SPOTS<br>EJECUTORES, ESTUDIO, MEZCLA, MASTER,<br>DEMO Y SUPERVISION. | | 1,030.25 | |
| 75 CARTRIDGES | | 750.00 | |
| | | | $1,780.25 |

620403

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380008

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB TELEVISION MARZO 8 A MARZO 15 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ -- TV<br>1 - 30" Marzo 8<br>1 - 30" " 10<br>3 - 30" " 12 | | $2,575.00 | |
| WAPA - TV<br>4 - 30" Marzo 8<br>2 - 30" " 9<br>1 - 30" " 10<br>2 - 30" " 11<br>2 - 30" " 13<br>4 - 30" " 15 | | $6,145.00 | $8,720.00 |

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380009

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TV MARZO 9 A MARZO 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WKBM - TV | | | |
| 2-30" Marzo 9 | | | |
| 1-30" " 10 | | | |
| 1-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | $2,800.00 | |
| II. WLUZ - TV | | | |
| 1-30" Marzo 9 | | | |
| 3-30" " 10 | | | |
| 2-30" " 11 | | | |
| 2-30" " 12 | | | |
| 2-30" " 13 | | | |
| 2-30" " 14 | | | |
| 1-30" " 15 | | 2,025.00 | |
| | | | $4,825.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 3800010

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA - MARZO 13/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. EL MUNDO<br>MARZO 13 - 14"x5c | | $1,470.00 | |
| II. EL NUEVO DIA<br>MARZO 13, - 14 x 5c | | 1,105.00 | |
| III. SAN JUAN STAR<br>MARZO 13 - 14x6c | | 1,411.20 | |
| IV. EL VOCERO<br>MARZO 13 - 13 5c | | 975.00 | |
| | | | $4,961.20 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 3780013

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 12 AL 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| I. WAPA-TV<br>MARZO 12 - 4 spots 30xx<br>MARZO 13 - 3 spots 30ss<br>MARZO 14 - 4 spots 30ss | | | $3,715.00 |

820405 38830

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380014

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOUS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 2VTR COPIES WLUZ | | 117.65 | |
| 2. ENTREGAS DE CARTRIDGES EN RADIO EMISORAS AREA METROPOLITANA E ISLA | | 100.00 | $217.65 |

820403 38031

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800015

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13 AL 3-15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3 - 30 Marzo 12<br>2 - 30 Marzo 13<br>1 - 15 Marzo 15 | | | $2,450.00 |
| WKAQ - TV<br>2 - 30 Marzo 13<br>3 - 30 Marzo 14<br>2 - 30 Marzo 15 | | | 2,800.00 |
| WAPA - TV<br>4 - 30 Marzo 13<br>1 - 30 Marzo 14<br>3 - 30 Marzo 15 | | | 3,440.00 |
| | | | $8,690.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 380016

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - TV<br>2 - 30" Marzo 12<br>4 - 30" Marzo 13<br>3 - 30" Marzo 14<br>1 - 30" Marzo 15 | | | $1,090.00 |
| WKMB - TV<br>1 - 30" Marzo 13 | | | 300.00 |
| WKBM TV<br>2-30" Marzo 12<br>3-20" Marzo 13<br>4-30" Marzo 14<br>4-30" Marzo 15 | | | 3,685.00 |
| | | | $5,075.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380017

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-12 AL 3-15-80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WAPA-TV<br><br>7 - 30ss Marzo 12<br>10- 30ss Marzo 13<br>13- 30ss Marzo 14<br>6 - 30ss Marzo 15 | | | $14,095.00 |

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I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380018

DATE 3-15-80

CLIENT CAMPAÑA KENNEDY PRESIDENTE

JOB ANUNCIOS PRENSA

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO - 16 | | $1,365.00 | |
| EL MUNDO<br>14" x 5c MARZO 16 | | 1,470.00 | |
| SAN JUAN STAR<br>13 1/x x 6c MARZO 16 | | 1,411.20 | |
| EL VOCERO<br>13" x 5c MARZO 14 (2)<br>13" x 5c MARZO 15 (2) | | 2,080.00<br>2,080.00 | $8,406.20 |

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I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice NO. 3800019

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB MISCELANEOS

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| REPARTIR CARTRIDGES A RADIO EMISORAS DEL AREA METROPOLITANA Y FUERA DEL AREA. | | $100.00 | |
| VIAR COMUNICADOS PRENSA MENSAJERO ESPECIAL. | | 50.00 | $150.00 |

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I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380020

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA - RADIO MARATON

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL MUNDO<br>6" x 3c Marzo 14 y 15 | | $612.00 | |
| EL NUEVO DIA<br>6" x 3 c MARZO 14 y 15 | | 612.00 | |
| EL VOCERO<br>6" x 3 c MARZO 14 y 15 | | 540.00 | $1,764.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380021

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB CAMPAÑA TELEVISION 3-13-y 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| COMITE KENNEDY PRESIDENTE: | | | |
| WAPA - TV | | | |
| 5 - 30 ss Marzo 13 | | | |
| 3 - 30 ss Marzo 14 | | | |
| 1 - 30 ss Marzo 15 | | | $3,000.00 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380022

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIO PRENSA MARZO 15/80 DOBLE VOTO

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| EL NUEVO DIA<br>13" x 5c MARZO 15 | | | $1,332.50 |
| EL MUNDO<br>14" x 5 c MARZO 15 | | | 1,505.00 |
| | | | $2,837.50 |

0 2 0 4 0 3 3 8 3 9

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3780023

DATE 3-15-80

CLIENT COMITE KENNEDY PRESIDENTE

JOB ANUNCIOS TELEVISION MARZO 13 /80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WKAQ - TV<br>3- 30ss MARZO 13 | | | $1,300.00 |

0 2 0 4 0 3 3 8 4 0

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800024

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Radio - Marzo 14 y 16

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WKAQ-Radio<br>16 spots - 30ss | | $ 976.00 | |
| 2. WKAQ-FM<br>45 spots - 30ss | | 390.00 | |
| | | | $=1,366.00 |

820403841

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800025

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Programa Radial en Cadena - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. WABA-Aguadilla | | $ 50.00 | |
| 2. WZAR-Ponce | | 150.00 | |
| 3. WKFE-Yauco | | 80.00 | |
| 4. WNIK-Arecibo | | 40.00 | |
| 5. WKVM-San Juan | | 200.00 | |
| 6. WVJP-Caguas | | 55.00 | |
| 7. WXRF-Guayama | | 96.00 | |
| 8. WEKO-Cabo Rojo | | 70.00 | |
| 9. WEGA-Vega Baja | | 55.00 | |
| 10. WOYE-Mayaguez | | 100.00 | |
| 11. WFBA-San Sebastian | | 60.00 | |
| 12. WMDD-Fajardo | | 100.00 | |
| 13. WLEY-Cayey | | 80.00 | |
| | | | $ 1,136.00 |

620403 38 42

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

56

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380026

DATE 15 de marzo /80

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - Mayo 15/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. 'El Día | | | |
| 6" x 3 c - marzo 15 | | $ 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 2. El Mundo | | | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 6" x 3 c - marzo 15 | | 306.00 | |
| 3. El Vocero | | | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| 6" x 3 c - marzo 15 | | 270.00 | |
| | | | $ 1,764.00 |

0 2 0 4 0 3 3 8 4 3

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

cc

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7280.

# invoice

NO. 380027

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Campaña Prensa - marzo 16/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| 1. El Mundo<br>14" x 11 c - marzo 16 (C.S.) | | $ 2,618.00, | |
| 2. El Mundo<br>14" x 5 c - marzo 16 | | 1,470.00 | |
| 3. El Mundo<br>14" x 5 c - marzo 16 | | 1,190.00 | |
| 4. El Nuevo Día<br>13" x 5 c - marzo 16 | | 1,105.00 | |
| | | | $ 6,383.00 |

8204053844

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800028

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Miscelaneos

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Entrega cartridges área metropolitana e interior de la isla - Jueves 13 y Viernes 14 (entregado por mensajero especial después de las 7:00 pm.) | | $250.00 | $250.00 |

0 2 0 4 0 3 3 3 8 4 5

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800029

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 3 spots Radio - marzo 12/80

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutores, estudio, mezcla cartridges, supervisión. | | $ 1,159.17 | |
| | | | $ 1,159.17 |

6204053846

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

11

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-1260.

# invoice

NO. 380030

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 2 spots radio

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Locutor, estudio, mezcla cartridges, supervisión. | | $ 594.86 | $ 594.86 |

820403 38847

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800031

DATE 17 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Programa de(1/2)media hora<br>6:30 a 7:00 pm.<br>Mensaje Rafael Hernández Colón<br>sobre las Primarias y Robert<br>Kennedy, Jr. | | $ 2,000.00 | $2,000.00 |

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I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

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LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800032

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Grabación - Programa Hernández Colón /Kennedy

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ - Grabación VTR para usarse en programa 30 minutos en WAPA. | | $1,000.00 | $1,000.00 |

0204033849

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800033

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Mensaje Hernández Colón - WAPA - TV

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| WLUZ-TV - 2 horas adicionales de edición y 1/2 hora grabación mensaje Rafael Hernández Colón marzo 14, 1980 | | 426.48 | $426.48 |

0 2 0 4 0 3 3 8 5 0

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 380003

DATE 15 de marzo de 1980

CLIENT Comité Kennedy Presidente

JOB Producción 5 spots - 30ss

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción 5 spots radio 30ss, locutores, estudio, mezcla, supervisión y 24 cartridges. | | 1,379.00 | $1,379.00 |

0204053851

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800035

DATE 3-17-80

CLIENT Comité Kennedy Presidente

JOB Producción serie de anuncio para prensa

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Producción serie de anuncios para la prensa y fotograbados. | | | $5,170.60 |

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julio Morales)

I certify that this invoice is correct and ▬ payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | Ck # 2 | (5,000.00) |
| | | Ck # 17 | (1,266.00) |
| | | Ck # 18 | (12,176.00) |
| | | | 150,520.33 |
| | | Ck # 24 | (23,790.00) |
| | | | 126,730.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

nn

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3600001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | 5 000.00 |
| | | # 13 | 126.00 |
| | | # 18 | 12,176.00 |
| | | # 24 | 23,796.00 |
| | | # 54 | 10,000.00 |
| | | | 116,730.33 |
| | | ck # 54 | <12,000.00> |
| We certify that this amount is correct and has been paid in full. | | | 104,730.33 |
| | | ck # 4A | 4,000.00 |
| | | | 100,730.33 |

(Julio Morales)

I certify that this invoice is correct and ➡ payment has been made. It will be due at its presentation.

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | -(5,000.00) |
| | | | 163,962.33 |
| | | ck # 17 | (1,266.00) |
| | | balance | 162,696.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

- SS

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | ck # 12 | Payment | (5000.00) |
| | | Balance | 163,962.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

FEC Ex. 3

'89 APR 19 AM 10:50

# REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

RAD ATTACHMENT 2

FEC Exhibit Three. 5-8-91. D.G.

1. Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

Address (Number and Street)
20 J ST.
VILLA CAPARRA

City, State and ZIP Code
GUAYNABO, P.R. 00657

☐ Check if address is different than previously reported.

2. FEC Identification Number
C 900227 71 800320

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a)
- ☒ April 15 Quarterly Report
- ☐ July 15 Quarterly Report
- ☐ October 15 Quarterly Report
- ☐ January 31 Year End Report
- ☐ July 31 Mid Year Report (Non-election Year Only)
- ☐ Monthly Report for _____
- ☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
- ☐ Thirtieth day report following the General Election on _____ in the State of _____
- ☒ Termination Report

(b) Is this Report an Amendment? ☐ YES ☒ NO

3-T-Q1 FEC-N

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period MARCH 10,1980 Through April 15, 1980 | | |
| 6. (a) Cash on Hand January 1, 1980 | NONE | $ NONE |
| (b) Cash on Hand at Beginning of Reporting Period | $ NONE | NONE |
| (c) Total Receipts (from Line 18) | $ 10,525.00 | $ 10,525.00 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ | $ |
| 7. Total Disbursements (from Line 28) | $ 10,525.00 | $ 10,525.00 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ (NONE) | $ NONE |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ NONE | NONE |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ NONE | NONE |

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

LUIS A. RIVERA
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

April 15,1980
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (6.88)

8207310033858

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

| Name of Committee (in Full) | Report Covering the Period: From: | To: |
|---|---|---|

| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
|---|---|---|
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | $10,525.00 | $10,525.00 |
| (Memo Entry Unitemized $ ) | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | $10,525.00 | $10,525.00 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 13. ALL LOANS RECEIVED | — | — |
| 14. LOAN REPAYMENTS RECEIVED | — | — |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | — | — |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | — | — |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | $10,525.00 | $10,525.00 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | $10,525.00 | $10,525.00 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | — | — |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | — | — |
| 24. LOAN REPAYMENTS MADE | — | — |
| 25. LOANS MADE | — | — |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | — | — |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | — | — |
| 27. OTHER DISBURSEMENTS | — | — |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | $10,525.00 | $10,525.00 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | $10,525.00 | $10,525.00 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | — | — |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | $10,525.00 | $10,525.00 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | $10,525.00 | $10,525.00 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | — | — |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | $10,525.00 | $10,525.00 |

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SCHEDULE A — ITEMIZED RECEIPTS

Page 1 of 14 for LINE NUMBER 11-B
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| | Name of Employer / Occupation | Date (month, day, year) | Amount of Each Receipt This Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>LUZ DE SELENIA SIACA<br>PATIO HILL #12<br>GUAYNABO, P.R. 00657<br>Receipt For: ☑ Primary ☐ General ☐ Other (specify): | Name of Employer: HOUSEWIFE<br>Occupation: HOUSEWIFE<br>Aggregate Year-to-Date—$ 1000.00 | MARCH 10, 1980 | $1,000.00 |
| B. Full Name, Mailing Address and ZIP Code<br>LORENZO MUÑOZ MORALES<br>COND. EL MIRADOR DEL CONDADO 202<br>SANTURCE, P.R. 00935<br>Receipt For: ☑ Primary ☐ General ☐ Other (specify): | Name of Employer: Ambiance, Inc.<br>Occupation: ENGINEER<br>Aggregate Year-to-Date—$ 250.00 | March 10, 1980 | $250.00 |
| C. Full Name, Mailing Address and ZIP Code<br>JOSE M. FELICIANO<br>COND. SOLEMAR<br>10A WASHINGTON ST.<br>CONDADO, P.R. 00935<br>Receipt For: ☑ Primary ☐ General ☐ Other (specify): | Name of Employer: NONE<br>Occupation: RETIRED<br>Aggregate Year-to-Date—$ 500.00 | MARCH 10, 1980 | $500.00 |
| D. Full Name, Mailing Address and ZIP Code<br>RAUL BUXEDA<br>KINGS COURT - McLEARY 63<br>SANTURCE, P.R. 00935<br>Receipt For: ☑ Primary ☐ General ☐ Other (specify): | Name of Employer: SELFEMPLOYED<br>Occupation: BUSINESSMAN<br>Aggregate Year-to-Date—$ 200.00 | March 10, 1980 | $200.00 |
| E. Full Name, Mailing Address and ZIP Code<br>DOMINGUEZ, DOMINGO<br>PADRE COLON 154<br>RIO PIEDRAS, P.R. 00925<br>Receipt For: ☑ Primary ☐ General ☐ Other (specify): | Name of Employer: BUSINESSMAN<br>Occupation: BUSINESS MAN<br>Aggregate Year-to-Date—$ 800 | March 10, 1980 | $800.00 |
| F. Full Name, Mailing Address and ZIP Code<br>EDELMIRO SALAS GARCIA<br>ESQUIRE BUILDING PENTHOUSE<br>RIO REY, P.R. 00917<br>Receipt For: ☑ Primary ☐ General ☐ Other (specify): | Name of Employer: SELF EMPLOYED<br>Occupation: ATTORNEY<br>Aggregate Year-to-Date—$ 250.00 | March 10, 1980 | $250.00 |
| G. Full Name, Mailing Address and ZIP Code<br>GILBERTO OLIVER PADILLA<br>1927 PASIONARIA<br>SANTA MARIA, RIO PIEDRAS, P.R. 00927<br>Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Name of Employer: TRIANGLE ENGINEERING CORP.<br>Occupation: ENGINEER<br>Aggregate Year-to-Date—$ 200.00 | MARCH 10, 1980. | $200.00 |

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) .....

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

# SCHEDULE A — ITEMIZED RECEIPTS

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

Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| A. JOSE LUIS MENDOZA<br>CENTRO COMERCIAL SAN FRANCISCO<br>RIO PIEDRAS, P.R. 00927 | SELF EMPLOYED<br>Occupation C.P.A. | MARCH 10,1980<br>Aggregate Year-to-Date—$ $250.00 | $250.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | | | |
| B. FELIX BRAVO<br>21 PERUSA Y ALCALA<br>RIO PIEDRAS, P.R. 00925 | UNEMPLOYED<br>Occupation RETIRED | MARCH 10,1980<br>Aggregate Year-to-Date—$ $100.00 | $100 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | | | |
| C. JOSE GRACIA<br>206 LA RABIDA<br>URB. BERNABE<br>HATO REY, P.R. 00917 | UNEMPLOYED<br>Occupation RETIRED | MARCH 10,1980<br>Aggregate Year-to-Date—$ $25.00 | $25.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | | | |
| D. PEDRO NEGRON RAMOS<br>325 SORBONA<br>UNIVERSITY GARDENS, RIO PIEDRAS, P.R. 00927 | ANTILLES MILITARY ACADEMY.<br>Occupation EDUCATOR | MARCH 10,1980<br>Aggregate Year-to-Date—$ $100.00 | $100.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | | | |
| E. LUIS RIVERA SANTOS<br>1605 PONCE DE LEON<br>SANTURCE, P.R. 00920 | SELF EMPLOYED<br>Occupation ECONOMIST | MARCH 10,1980<br>Aggregate Year-to-Date—$ $300.00 | $300.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | | | |
| F. HECTOR RIVERA DELGADO<br>LODI 583<br>RIO PIEDRAS, P.R. 00925 | HERIDEL, INC.<br>Occupation ENGINEER | MARCH 10,1980<br>Aggregate Year-to-Date—$ $200.00 | $200.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | | | |
| G. LUIS A. RIVERA<br>20 J ST.<br>GUAYNABO, P.R. 00657 | SELF EMPLOYED<br>Occupation ENGINEER | MARCH 10,1980<br>Aggregate Year-to-Date—$ $500.00 | $500.00 |
| Receipt For: ☒ Primary ☐ General ☐ Other (specify): | | | |

SUBTOTAL of Receipts This Page (optional) . . . . .

TOTAL This Period (last page this line number only) . . . . .

8 2 0 4 0 3 1 0 7 3 7 3 8 6 1 5

SCHEDULE A — ITEMIZED RECEIPTS

Page 2 of 4 for LINE NUMBER 11
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| A. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| GUILLERMO RODRIGUEZ<br>E-4 ST.<br>VILLA CAPARRA, P.R. 00657 | SELF EMPLOYED<br>Occupation<br>ENGINEER | March 10, 1980 | $700.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $ 700.00 | |
| B. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| EMILIO DAVILA<br>UNAVAILABLE | UNKNOWN OR N/A<br>Occupation<br>UNKNOWN OR N/A | March 10, 1980 | $100.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $100.00 | |
| C. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| MANUEL GARCIA<br>C-6 ST.<br>VILLA CAPARRA<br>GUAYNABO, P.R. 00657 | SELF EMPLOYED<br>Occupation<br>BUSINESSMAN | March 10, 1980 | $500.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $500.00 | |
| D. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| RUBEN RODRIGUEZ<br>36 A ST.<br>VILLA CAPARRA<br>GUAYNABO, P.R. 00657 | SELF EMPLOYED<br>Occupation<br>ATTORNEY | March 10, 1980 | $500.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $ 500.00 | |
| E. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| HIRAN CANCIO<br>566 RAMON GANDIA<br>HATOREY, P.R. 00917 | SELF EMPLOYED<br>Occupation<br>ATTORNEY | March 10, 1980 | $500.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $ 500.00 | |
| F. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| RAMON GARCIA<br>32 A ST.<br>VILLA CAPARRA<br>GUAYNABO, P.R. 00657. | SELF EMPLOYED<br>Occupation<br>BUSINESSMAN | March 10, 1980 | $500.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $500.00 | |
| G. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| TEODORO MOSCOSO<br>2 MADRID<br>SANTURCE, P.R. 00918 | BANCO DE SANTANDER<br>Occupation<br>BANKER | March 10, 1980 | $500.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $500.00 | |

SUBTOTAL of Receipts This Page (optional) . . . . .

TOTAL This Period (last page this line number only) . . . . .

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SCHEDULE A — ITEMIZED RECEIPTS

LINE NUMBER 11A
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

**A. Full Name, Mailing Address and ZIP Code**
GUMERSINDO BILBAO
N/A.

Name of Employer: UNKNOWN OR N/A
Occupation: BUSINESSMAN
Date (month, day, year): March 10, 1980
Amount of Each Receipt this Period: $500
Aggregate Year-to-Date—$: $500.00
Receipt For: X Primary ☐ General ☐ Other (specify):

**B. Full Name, Mailing Address and ZIP Code**
ROBERTO DE JESUS
BANCO DE PONCE BLDNG.
HATO REY, P.R. 00917

Name of Employer: BANCO DE PONCE
Occupation: BANKER
Date (month, day, year): March 10, 1980
Amount of Each Receipt This Period: $300.00
Aggregate Year-to-Date—$: $300.00
Receipt For: X Primary ☐ General ☐ Other (specify):

**C. Full Name, Mailing Address and ZIP Code**
JOSE RAMON NOGUERAS
N/A.

Name of Employer: N/A.
Occupation: N/A
Date (month, day, year): March 10, 1980
Amount of Each Receipt This Period: $500.00
Aggregate Year-to-Date—$: 500.00
Receipt For: X Primary ☐ General ☐ Other (specify):

**D. Full Name, Mailing Address and ZIP Code**
ANTONIO COLONADO
180 DIANA
DOS PINOS, RIO PIEDRAS, P.R. 00923

Name of Employer: SELF EMPLOYED
Occupation: ATTORNEY
Date (month, day, year): March 10, 1980
Amount of Each Receipt This Period: $250.00
Aggregate Year-to-Date—$: $250.00
Receipt For: X Primary ☐ General ☐ Other (specify):

**E. Full Name, Mailing Address and ZIP Code**
SERGIO CAMERO
2017 PASEO ALHAMBRA
TORRIMAR, GUAYNABO 00657

Name of Employer: SELF EMPLOYED
Occupation: FINANCIAL BOOSULTANT
Date (month, day, year): March 10, 1980
Amount of Each Receipt This Period: $250.00
Aggregate Year-to-Date—$: $250
Receipt For: X Primary ☐ General ☐ Other (specify):

**F. Full Name, Mailing Address and ZIP Code**
RAMON RIOS ROURE
TABONUCO ESQ. ORTEGON
CAPARRA HILLS
GUAYNABO, P.R. 00657

Name of Employer: UNKNOWN
Occupation: N/A
Date (month, day, year): March 10, 1980
Amount of Each Receipt This Period: $750.00
Aggregate Year-to-Date—$: $750.
Receipt For: X Primary ☐ General ☐ Other (specify):

**G. Full Name, Mailing Address and ZIP Code**

Name of Employer:
Occupation:
Date (month, day, year):
Amount of Each Receipt This Period:
Aggregate Year-to-Date—$:
Receipt For: ☐ Primary ☐ General ☐ Other (specify):

SUBTOTAL of Receipts This Page (optional): .....

TOTAL This Period (last page only, line number only): ..... $10,525.00

8 0 4 0 3 3 3 8 6 3 7 7

SCHEDULE B — ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER 22
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| | Purpose of Disbursement / Disbursement for | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| A. Full Name, Mailing Address and ZIP Code<br>VIDEO GROUP<br>MARGINAL ESQ. ROMA<br>EXT. VILLA CAPARRA<br>GUAYNABO, P.R. 00657 | Purpose of Disbursement: FILMING AND VIDEOTAPING T.V. COMMERCIAL<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | MARCH 12, 1980 | $2,300.00 |
| B. Full Name, Mailing Address and ZIP Code<br>JEDU MASCORETTO<br>6900 FLAGLER ST.<br>APT. 29;<br>MIAMI, FLORIDA 33144 | Purpose of Disbursement: PROFESSIONAL SERVICES AS DIRECTOR OF T.V. COMMERCIAL<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | MARCH 12, 1980 | $1,000.00 |
| C. Full Name, Mailing Address and ZIP Code<br>LOPITO, ILIANA & HOWIE<br>716 CONCORDIA<br>MIRAMAR, SANTURCE, 00935 | Purpose of Disbursement: ADVERTISING AGENCY INCL. T.V. LAYOUT<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | MARCH 12. 1980 | $7,125.00 |
| D. Full Name, Mailing Address and ZIP Code<br>ARTURO REY QUIÑONES<br>(UNKOWN) OR NOT AVAILABLE | Purpose of Disbursement: ART SERVICES<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | MARCH 12, 1980 | $100.00 |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| SUBTOTAL of Disbursements This Page (optional) | | | 10,525.00 |
| TOTAL This Period (last page this line number only) | | | $10,525.00 |

9200403538647

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | | ck # 12 | (5000.00) |
| | | ck # 17 | (1266.00) |
| | | ck # 1A | (12 176.00) |
| | | ck # 2A | (23,790.00) |
| | | ck # 5A | (10,000.00) |
| | | | 116,730.33 |
| | | ck # 6A | (4 000.00) |
| | | | 112,730.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

PP

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5,000.00) |
| | | ck # 17 | (1,266.00) |
| | | ck # 1A | (12,176.00) |
| | | ck # 2A | (23,790.00) |
| | | | 126,730.33 |
| | | ck # 3A | (10,000.00) |
| | | | 116,730.33 |
| We certify that this amount is correct and has been paid in full. | | | |

(Julia Morales)

I certify that this invoice is correct and no payment has been made. It will be due at its presentation.

-99

LOPITO, ILEANA & HOWIE, INC. Concordia 716, Miramar, P.R. 00907 Tel. 724-7260.

# invoice

NO. 3800001

DATE March 17, 1980

CLIENT Kennedy For President - Committee

JOB Production & Media Campaign

| DESCRIPTION | INVOICE NO. | AMOUNT | TOTAL |
|---|---|---|---|
| Expenses incurred on TV, Radio and Press Media also production of radio spots, Press Ads and miscellaneous charges, (deliveries and others) | | | 168,962.33 |
| | Payments | ck # 12 | (5 000.00) |
| | | ck # 17 | (1 266.00) |
| | | | 162,696.33 |
| | | ck # 18 | (12, 176.00) |
| | | Balance | 150,520.33 |

We certify that this amount is correct and has been paid in full.

(Julio Morales)

I certify that this invoice is correct and payment has been made. It will be due at its presentation.

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

'89 APR 19 AM 10:56

(Summary Page)

RAD ATTACHMENT 2

1. Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

Address (Number and Street)
20 J ST.
VILLA CADARRA

City, State and ZIP Code
GUAYNABO, P.R. 00657

☐ Check if address is different than previously reported.

2. FEC Identification Number
C99002271 800320

3. ~~This committee qualified as a multicandidate committee during this Reporting Period on~~ _____ (date)

4. TYPE OF REPORT (check appropriate boxes)
(a) ☒ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☒ Termination Report
(b) Is this Report an Amendment? ☐ YES ☒ NO

3-T-Q1
FE2=N

| SUMMARY | Column A This Period | Column B Calendar Year-to-Date |
|---|---|---|
| 5. Covering Period MARCH 10,1980 Through April 15, 1980 | | |
| 6. (a) Cash on Hand January 1, 1980 | NONE | $ NONE |
| (b) Cash on Hand at Beginning of Reporting Period | $ NONE | NONE |
| (c) Total Receipts (from Line 18) | $ 10,525.00 | $ 10,525.00 |
| (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B) | $ | $ |
| 7. Total Disbursements (from Line 28) | $ 10,525.00 | $ 10,525.00 |
| 8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d)) | $ (NONE) | $ NONE |
| 9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D) | $ NONE | NONE |
| 10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D) | $ NONE | NONE |

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

LUIS A. RIVERA
Type or Print Name of Treasurer

SIGNATURE OF TREASURER

April 15,1980
Date

For further information, contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

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

All previous versions of FEC FORM 3 and FEC FORM 3a are obsolete and should no longer be used.

FEC FORM 3X (3.80)

8007310137372
02040333868

# DETAILED SUMMARY PAGE
## of Receipts and Disbursements
## (Page 2, FEC FORM 3X)

| Name of Committee (in Full) | Report Covering the Period: From: | To: |
|---|---|---|
| | COLUMN A Total This Period | COLUMN B Calendar Year-to-Date |
| **I. RECEIPTS** | | |
| 11. CONTRIBUTIONS (other than loans) FROM: | | |
| (a) Individuals/Persons Other Than Political Committees | $10,525.00 | $10,525.00 |
| (Memo Entry Unitemized $ ) | | |
| (b) Political Party Committees | | |
| (c) Other Political Committees | | |
| (d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c) | $10,525.00 | $10,525.00 |
| 12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 13. ALL LOANS RECEIVED | — | — |
| 14. LOAN REPAYMENTS RECEIVED | — | — |
| 15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) | — | — |
| 16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 17. OTHER RECEIPTS (Dividends, Interest, etc.) | — | — |
| 18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17) | $10,525.00 | $10,525.00 |
| **II. DISBURSEMENTS** | | |
| 19. OPERATING EXPENDITURES | $10,525.00 | $10,525.00 |
| 20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES | — | — |
| 21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES | — | — |
| 22. INDEPENDENT EXPENDITURES (Use Schedule E) | — | — |
| 23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F) | — | — |
| 24. LOAN REPAYMENTS MADE | — | — |
| 25. LOANS MADE | — | — |
| 26. REFUNDS OF CONTRIBUTIONS TO: | | |
| (a) Individuals/Persons Other Than Political Committees | — | — |
| (b) Political Party Committees | — | — |
| (c) Other Political Committees | — | — |
| (d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c) | — | — |
| 27. OTHER DISBURSEMENTS | — | — |
| 28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27) | $10,525.00 | $10,525.00 |
| **III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES** | | |
| 29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d | $10,525.00 | $10,525.00 |
| 30. TOTAL CONTRIBUTION REFUNDS from Line 26d | — | — |
| 31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29) | $10,525.00 | $10,525.00 |
| 32. TOTAL OPERATING EXPENDITURES from Line 19 | $10,525.00 | $10,525.00 |
| 33. OFFSETS TO OPERATING EXPENDITURES from Line 15 | — | — |
| 34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32) | $10,525.00 | $10,525.00 |

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SCHEDULE A — ITEMIZED RECEIPTS

Page 1 of 4 for LINE NUMBER 12
(Use separate schedule(s) for each category of the Detailed Summary Page)

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Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| A. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| LUZ DE SELENIA STACA<br>PATIO HILL #12<br>GUAYNABO, P.R. 00657 | HOUSEWIFE<br>Occupation: HOUSEWIFE | MARCH, 10, 1980 | $1,000.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $1000.00 | |
| B. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| LORENZO MUÑOZ MORALES<br>COND. EL MIRADOR DEL CONDADO 202<br>SANTURCE, P.R. 00935 | Ambiance, Inc.<br>Occupation: ENGINEER | MARCH 10, 1980 | $250.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $250.00 | |
| C. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| JOSE M. FELICIANO<br>COND. SOLEMAR<br>10A WASHINGTON ST.<br>CONDADO, P.R. 00935 | NONE<br>Occupation: RETIRED | MARCH 10, 1980 | $500.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $500.00 | |
| D. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| RAUL BUXEDA<br>KINGS COURT. MCLEARY 63<br>SANTURCE, P.R. 00935 | SELFEMPLOYED<br>Occupation: BUSINESSMAN | March 10, 1980 | $200.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $250.00 | |
| E. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| DOMINGUEZ, DOMINGO<br>PADRE COLON 154<br>RIO PIEDRAS, P.R. 00925 | BUSINESSMAN<br>Occupation: BUSINESS MAN | March 10, 1980 | $800.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $800 | |
| F. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| EDELMIRO SALAS GARCIA<br>ESQUIRE BUILDING PENTHOUSE<br>HATO REY, P.R. 00917 | SELF EMPLOYED<br>Occupation: ATTORNEY | March 10, 1980 | $250.00 |
| Receipt For: ✓ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $250.00 | |
| G. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| GILBERTO OLIVER PADILLA<br>1927 PASIONARIA<br>SANTA MARIA, RIO PIEDRAS, P.R. 00927 | TRIANGLE ENGINEERING CORP.<br>Occupation: ENGINEER | MARCH 10, 1980. | $200.00 |
| Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $200.00 | |

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

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

Page 2 of 4 pages
LINE NUMBER 12
(Use separate schedule(s) for each category of the Detailed Summary Page)

# SCHEDULE A — ITEMIZED RECEIPTS

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Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| A. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| JOSE LUIS MENDOZA<br>CENTRO COMERCIAL SAN FRANCISCO<br>RIO PIEDRAS, P.R. 00927 | SELF EMPLOYED<br>Occupation C.P.A. | MARCH 10,1980 | $250.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $250.00 | |
| B. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| FELIX BRAVO<br>21 PERUSA Y ALCALA<br>RIO PIEDRAS, P.R. 00925 | UNEMPLOYED<br>Occupation RETIRED | MARCH 10,1980 | $100 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $100.00 | |
| C. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| JOSE GRACIA<br>206 LA RABIDA<br>URB. BERNABE<br>HATO REY, P.R. 00917 | UNEMPLOYED<br>Occupation RETIRED | MARCH 10,1980 | $25.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $25.00 | |
| D. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| PEDRO NEGRON RAMOS<br>325 SORBONA<br>UNIVERSITY GARDENS, RIO PIEDRAS, P.R. 00927 | ANTILLES MILITARY ACADEMY.<br>Occupation EDUCATOR | MARCH 10,1980 | $100.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $100.00 | |
| E. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| LUIS RIVERA SANTOS<br>1605 PONCE DE LEON<br>SANTURCE, P.R. 00920 | SELF EMPLOYED<br>Occupation ECONOMIST | MARCH 10,1980 | $300.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $300.00 | |
| F. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| HECTOR RIVERA DELGADO<br>LODI 583<br>RIO PIEDRAS, P.R. 00925 | HERIDEL, INC.<br>Occupation ENGINEER | MARCH 10,1980 | $200.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $200.00 | |
| G. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| LUIS A. RIVERA<br>20 J ST.<br>GUAYNABO, P.R. 00657 | SELF EMPLOYED<br>Occupation ENGINEER | MARCH 10,1980 | $500.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Aggregate Year-to-Date—$ | $500.00 | |

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) .....

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SCHEDULE A — ITEMIZED RECEIPTS

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

Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| Full Name, Mailing Address and ZIP Code | Name of Employer / Occupation / Aggregate Year-to-Date | Date (month, day, year) | Amount of Each Receipt This Period |
|---|---|---|---|
| A. GUILLERMO RODRIGUEZ<br>E-4 ST.<br>VILLA CAPARRA, P.R. 00657<br>Receipt For: ☒ Primary ☐ General ☐ Other (specify): | SELF EMPLOYED<br>ENGINEER<br>$ 100.00 | March 10, 1980 | $700.00 |
| B. EMILIO DAVILA<br>UNAVAILABLE<br>Receipt For: ☒ Primary ☐ General ☐ Other (specify): | UNKNOWN OR N/A<br>UNKNOWN OR N/A<br>$100.00 | March 10, 1980 | $100.00 |
| C. MANUEL GARCIA<br>C-6 ST.<br>VILLA CAPARRA<br>GUAYNABO, P.R. 00657<br>Receipt For: ☒ Primary ☐ General ☐ Other (specify): | SELF EMPLOYED<br>BUSINESSMAN<br>$500.00 | March 10, 1980 | $500.00 |
| D. RUBEN RODRIGUEZ<br>36 A ST.<br>VILLA CAPARRA<br>GUAYNABO, P.R. 00657<br>Receipt For: ☒ Primary ☐ General ☐ Other (specify): | SELF EMPLOYED<br>ATTORNEY<br>$ 500.00 | March 10, 1980 | $500.00 |
| E. HIRAN CANCIO<br>566 RAMON GANDIA<br>HATOREY, P.R. 00917<br>Receipt For: ☒ Primary ☐ General ☐ Other (specify): | SELF EMPLOYED<br>ATTORNEY<br>$ 500.00 | March 10, 1980 | $500.00 |
| F. RAMON GARCIA<br>32 A ST.<br>VILLA CAPARRA<br>GUAYNABO, P.R. 00657.<br>Receipt For: ☒ Primary ☐ General ☐ Other (specify): | Self employed<br>BUSINESSMAN<br>$500.00 | March 10, 1980 | $500.00 |
| G. TEODORO MOSCOSO<br>2 MADRID<br>SANTURCE, P.R. 00918<br>Receipt For: ☒ Primary ☐ General ☐ Other (specify): | BANCO DE SANTANDER<br>BANKER<br>$500.00 | March 10, 1980 | $500.00 |

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) .....

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SCHEDULE A — ITEMIZED RECEIPTS

LINE NUMBER: 12
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| A. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt this Period |
|---|---|---|---|
| GUMERSINDO BILBAO<br>N/A. | UNKNOWN OR N/A | March 10, 1980 | $500 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Occupation: BUSINESSMAN | | |
| | Aggregate Year-to-Date—$ | $500.00 | |
| B. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| ROBERTO DE JESUS<br>BANCO DE PONCE BLDNG.<br>HATO REY, P.R. 00917 | BANCO DE PONCE | March 10, 1980 | $300.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Occupation: BANKER | | |
| | Aggregate Year-to-Date—$ | $300.00 | |
| C. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| JOSE RAMON NOGUERAS<br>N/A. | N/A. | March 10, 1980 | $500.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Occupation: N/A | | |
| | Aggregate Year-to-Date—$ | 500.00 | |
| D. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| ANTONIO COLOMADO<br>780 DIANA<br>DOS PINOS, RIO PIEDRAS, P.R. 00923 | SELF EMPLOYED | March 10, 1980 | $250.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Occupation: ATTORNEY | | |
| | Aggregate Year-to-Date—$ | $250.00 | |
| E. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| SERGIO CAMERO<br>2017 PASEO ALHAMBRA<br>TORRIMAR, GUAYNABO 00657 | SELF EMPLOYED | March 10, 1980 | $250.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Occupation: FINANCIAL CONSULTANT | | |
| | Aggregate Year-to-Date—$ | $250 | |
| F. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| RAMON RIOS ROURE<br>TABONUCO ESQ. ORTEGON<br>CAPARRA HILLS<br>GUAYNABO, P.R. 00657 | UNKNOWN | March 10, 1980 | $750.00 |
| Receipt For: X Primary ☐ General ☐ Other (specify): | Occupation: N/A | | |
| | Aggregate Year-to-Date—$ | $750. | |
| G. Full Name, Mailing Address and ZIP Code | Name of Employer | Date (month, day, year) | Amount of Each Receipt This Period |
| | | | |
| Receipt For: ☐ Primary ☐ General ☐ Other (specify): | Occupation | | |
| | Aggregate Year-to-Date—$ | | |

SUBTOTAL of Receipts This Page (optional) .....

TOTAL This Period (last page this line number only) ..... $10,525.00

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SCHEDULE B

# ITEMIZED DISBURSEMENTS

Page 1 of 1 for LINE NUMBER 23
(Use separate schedule(s) for each category of the Detailed Summary Page)

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

Name of Committee (in Full)
DEFENSORES DE LA DEMOCRACIA

| A. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement | Date (month, day, year) | Amount of Each Disbursement This Period |
|---|---|---|---|
| VIDEO GROUP<br>MARGINAL ESQ. ROMA<br>EST. VILLA CAPARRA<br>GUAYNABO, P.R. 00657 | FILMING AND VIDEOTAPING T.V. COMMERCIAL<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | MARCH 12, 1980 | $2,300.00 |
| B. Full Name, Mailing Address and ZIP Code<br>JEDU MASCORETTO<br>6900 FLAGLER ST.<br>APT. 29;<br>MIAMI, FLORIDA 33144 | Purpose of Disbursement<br>PROFESSIONAL SERVICES AS DIRECTOR OF T.V. COMMERCIAL<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | Date (month, day, year)<br>MARCH 12, 1980 | Amount of Each Disbursement This Period<br>$1,000.00 |
| C. Full Name, Mailing Address and ZIP Code<br>LOPITO, ILIANA & HOWIE<br>716 CONCORDIA<br>MIRAMAR, SANTURCE, 00935 | Purpose of Disbursement<br>ADVERTISING AGENCY INCL. T.V. LABOR<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | Date (month, day, year)<br>MARCH 12. 1980 | Amount of Each Disbursement This Period<br>$7,125.00 |
| D. Full Name, Mailing Address and ZIP Code<br>ARTURO REY QUIÑONES<br>(UNKOWN) OR NOT AVAILABLE | Purpose of Disbursement<br>ART SERVICES<br>Disbursement for: ☒ Primary ☐ General ☐ Other (specify): | Date (month, day, year)<br>MARCH 12, 1980 | Amount of Each Disbursement This Period<br>$100.00 |
| E. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| F. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| G. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| H. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| I. Full Name, Mailing Address and ZIP Code | Purpose of Disbursement<br>Disbursement for: ☐ Primary ☐ General ☐ Other (specify): | Date (month, day, year) | Amount of Each Disbursement This Period |
| SUBTOTAL of Disbursements This Page (optional) | | | 10,525.00 |
| TOTAL This Period (last page this line number only) | | | $10,525.00 |

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FEC Exh 2

FEC Exhibit 2 5-8-80 O.C.

# SWORN STATEMENT

I, Julio Héctor Morales, of legal age, married, Administrative Officer of an advertising agency and resident of San Juan, Puerto Rico, do hereby swear:

1. That my personal circumstances are the above mentioned.

2. That I am employed in Lopito, Ileana & Howie, an advertising agency, doing business in San Juan, Puerto Rico.

3. That this agency performed part of the advertising for the Kennedy campaign in Puerto Rico.

4. That we received $168,962.33 of which $88,230.33 were paid in cash for the Kennedy Campaign media expenses.

5. That the Kennedy Campaign in Puerto Rico has completed their debts with our agency.

In San Juan, Puerto Rico, 17 of April, 1980.

Julio Hector Morales

AFFIDDAVIT NO. 2121

Suscribed and sworn to before me by Julio Héctor Morales of the personal circumstances above mentioned.

In San Juan, Puerto Rico, 17 of April, 1980.

LUIS FRANCISCO HERNANDEZ VELEZ

Luis Francisco Hernández Vélez
Notary Public

0204033875

U.S. DEPARTMENT OF JUSTICE
U.S. ATTORNEY
FEDERAL OFFICE BLDG.
Room 101, Carlos Chardon St.
Hato Rey, Puerto Rico 00918

POSTAGE AND FEES PAID
U.S. DEPARTMENT OF JUSTICE
JUS 431

Ms. Marsha Gentner
Office of General Counsel
Federal Elections Committee
1325 K Street, N.W.
Washington, D.C. 20463

FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1370 Depositions

Date Filmed 7-24-82 Camera No. --- 2

Cameraman SPC