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August 11, 2023

Wanda D. Brown, Esq.  
 Assistant General Counsel  
 Complaints Examination & Legal Administration  
 Federal Election Commission  
 1050 First Street NE  
 Washington, DC 20463

VIA E-MAIL: [cela@fec.gov](mailto:cela@fec.gov)

**Re: P-MUR 668 Response from Salvemos A Puerto Rico and Joseph Fuentes**

We represent Salvemos A Puerto Rico (“Salvemos”) and Joseph Fuentes (“Fuentes”), in his official capacity as Treasurer (collectively “Respondents”) in response to your correspondence numbered P-MUR 668 dated July 27, 2023. The P-MUR vaguely references allegations that Respondents may have misreported their source of contributions and violated coordinate communication standards set forth in the Federal Election Campaign Act of 1971, as amended (“FECA” or “the Act”). We respectfully request that the Commission exercise prosecutorial discretion to dismiss this matter because these allegations have already been reviewed and resolved by the United States Department of Justice (“DOJ”), *See* Exhibit A, and the Office of the Election Comptroller in Puerto Rico, *See* Exhibit B. As such, the Commission’s resources are better focused elsewhere.

By way of relevant background information, a complaint was filed with the FEC on August 11, 2020 alleging that Respondents violated the Act and Commission regulations by coordinating communications with Comite Amigos Pedro Pierluisi, the campaign committee for Pedro Pierluisi’s bid for Governor of Puerto Rico.<sup>1</sup> On September 23, 2020, Respondents submitted a response to the aforementioned complaint, arguing that the Commission lacked jurisdiction over the issue as the candidate involved was not a federal candidate, and that the complaint failed to demonstrate that Respondents’ activities were performed at the request or suggestion of Pierluisi or any other candidate. To date, the Commission has not made Respondents aware of any determination as to MUR 7772.

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<sup>1</sup> The Commission numbered the matter MUR 7772.

Shortly thereafter, the DOJ initiated an investigation into the activities conducted by Respondents during the 2020 election, including the allegations at issue in MUR 7772. Respondents ultimately pled guilty to one count of scheming to falsify and conceal material facts in violation of 18 U.S.C. § 1001. Salvemos agreed to pay a \$150,000.00 fine and file amended campaign finance reports with the Commission. *See* Exhibit C. Fuentes was sentenced to fourteen months in prison. On June 29, 2022, we submitted a supplemental response to MUR 7772 on behalf of Respondents to inform the Commission of the DOJ investigation, and it is worth noting that in Mr. Fernandez’s plea agreement with DOJ, there was no finding of coordination.

During the course of the DOJ investigation, Respondents filed amended reports with the FEC. As evidenced by the email exchange between our firm and Jonathan Jacobson at the DOJ, Respondents filed the reports, as drafted, that the Commission appears to now be alleging contain information that violates the Act, in cooperation with DOJ. *See* Exhibit D. To the extent that there was any “misreporting” by Respondents in 2022 or 2023, it was done as part of good faith cooperation with the DOJ and Respondents should not face additional punishment for such cooperation. Please note that while Commission staff has not allowed Salvemos to file a termination report (apparently due to dormant but still pending potential FEC enforcement)<sup>2</sup>, Citibank shut down the Committee’s bank account, and in lieu of a 2022 Year End Report, the Commission was sent a letter regarding the status of Committee activity. *See* Exhibit F.

Finally, the articles of termination were submitted on behalf of Salvemos A Puerto Rico, Inc. on January 18, 2023<sup>3</sup> and January 19, 2023<sup>4</sup>, and Salvemos has had no financial activity since said date. We, as counsel, have reached out to Commission staff multiple times to attempt to resolve and terminate Respondents’ issues with the Commission, and received no substantive response. Respondents have both already paid substantial prices through the criminal justice system for the matters at issue here. Consequently, we ask that the Commission use its prosecutorial discretion to close the file.

Respectfully submitted,



Charles Spies  
Elizabeth K. Lilienthal  
*Counsel to Respondents*

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<sup>2</sup> *See* Exhibit E.

<sup>3</sup> *See* Exhibit G.

<sup>4</sup> *See* Exhibit H.

# **EXHIBIT A**

UNITED STATES DISTRICT COURT

JUDICIAL

District of

PUERTO RICO

UNITED STATES OF AMERICA  
V.

SALVEMOS A PUERTO RICO, INC.

**JUDGMENT IN A CRIMINAL CASE**  
(For Organizational Defendants)

CASE NUMBER: 3:22-CR-00182-002 (JL)

Peter Koski, Joaquin Monserrate-Matienzo & Jose Aguayo  
Defendant Organization's Attorney

**THE DEFENDANT ORGANIZATION:**

pleaded guilty to count(s) one of Information.

pleaded nolo contendere to count(s) \_\_\_\_\_  
which was accepted by the court.

was found guilty on count(s) \_\_\_\_\_  
after a plea of not guilty.

The organizational defendant is adjudicated guilty of these offenses:

Title & Section	Nature of Offense	Offense Ended	Count
18 U.S.C. § 1001(a)(1)	Scheme to Falsity and Conceal Material Facts	11/2/2020	One

The defendant organization is sentenced as provided in pages 2 through 4 of this judgment.

The defendant organization has been found not guilty on count(s) \_\_\_\_\_

Count(s) \_\_\_\_\_  is  are dismissed on the motion of the United States.

It is ordered that the defendant organization must notify the United States attorney for this district within 30 days of any change of name, principal business address, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant organization must notify the court and United States attorney of material changes in economic circumstances.

Defendant Organization's  
Federal Employer I.D. No.: 81-1503303

8/26/2022  
Date of Imposition of Judgment

Defendant Organization's Principal Business Address:

1701 Pennsylvania Ave. NW Suite 200  
Washington, DC 20006-5823

S/ Joseph N. Laplante  
Signature of Judge

Joseph N. Laplante Senior, U.S. District Judge  
Name of Judge Title of Judge

8/26/2022  
Date

Defendant Organization's Mailing Address:

1701 Pennsylvania Ave. NW Suite 200  
Washington, DC 20006-5823

DEFENDANT ORGANIZATION: SALVEMOS A PUERTO RICO, INC.  
CASE NUMBER: 3:22-CR-00182-002 (JL)

### PROBATION

The defendant organization is hereby sentenced to probation for a term of :

Three (3) years.

The defendant organization shall not commit another federal, state or local crime.

If this judgment imposes a fine or a restitution obligation, it is a condition of probation that the defendant organization pay in accordance with the Schedule of Payments sheet of this judgment.

The defendant organization must comply with the standard conditions that have been adopted by this court as well as with any additional conditions on the attached page (if indicated below).

### STANDARD CONDITIONS OF SUPERVISION

- 1) within thirty days from the date of this judgment, the defendant organization shall designate an official of the organization to act as the organizations's representative and to be the primary contact with the probation officer;
- 2) the defendant organization shall answer truthfully all inquiries by the probation officer and follow the instructions of the probation officer;
- 3) the defendant organization shall notify the probation officer ten days prior to any change in principal business or mailing address;
- 4) the defendant organization shall permit a probation officer to visit the organization at any of its operating business sites;
- 5) the defendant organization shall notify the probation officer within seventy-two hours of any criminal prosecution, major civil litigation, or administrative proceeding against the organization;
- 6) the defendant organization shall not dissolve, change its name, or change the name under which it does business unless this judgment and all criminal monetary penalties imposed by this court are either fully satisfied or are equally enforceable against the defendant's successors or assignees; and
- 7) the defendant organization shall not waste, nor without permission of the probation officer, sell, assign, or transfer its assets.

DEFENDANT ORGANIZATION: SALVEMOS A PUERTO RICO, INC.  
CASE NUMBER: 3:22-CR-00182-002 (JL)

**CRIMINAL MONETARY PENALTIES**

The defendant organization must pay the following total criminal monetary penalties under the schedule of payments on Sheet 4.

	<u>Assessment</u>	<u>Fine</u>	<u>Restitution</u>
<b>TOTALS</b>	\$ 400.00	\$ 150,000.00	\$

- The determination of restitution is deferred until \_\_\_\_\_. An *Amended Judgment in a Criminal Case* (AO 245C) will be entered after such determination.
- The defendant organization shall make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant organization makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss*</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
<b>TOTALS</b>	\$ 0.00	\$ 0.00	

- Restitution amount ordered pursuant to plea agreement \$ \_\_\_\_\_
- The defendant organization shall pay interest on restitution or a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 4 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).
- The court determined that the defendant organization does not have the ability to pay interest, and it is ordered that:
  - the interest requirement is waived for the  fine  restitution.
  - the interest requirement for the  fine  restitution is modified as follows:

\* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT ORGANIZATION: SALVEMOS A PUERTO RICO, INC.  
CASE NUMBER: 3:22-CR-00182-002 (JL)

**SCHEDULE OF PAYMENTS**

Having assessed the organization's ability to pay, payment of the total criminal monetary penalties are due as follows:

- A  Lump sum payment of \$ 150,400.00 due immediately, balance due
  - not later than \_\_\_\_\_, or
  - in accordance with  C or  D below; or
- B  Payment to begin immediately (may be combined with  C or  D below); or
- C  Payment in \_\_\_\_\_ (e.g., equal, weekly, monthly, quarterly) installments of \$ \_\_\_\_\_ over a period of \_\_\_\_\_ (e.g., months or years), to commence \_\_\_\_\_ (e.g., 30 or 60 days) after the date of this judgment; or
- D  Special instructions regarding the payment of criminal monetary penalties:

All criminal monetary penalties are made to the clerk of the court.

The defendant organization shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

Joint and Several

Defendant and Co-Defendant Names and Case Numbers (including defendant number), Total Amount, Joint and Several Amount, and corresponding payee, if appropriate.

- The defendant organization shall pay the cost of prosecution.
- The defendant organization shall pay the following court cost(s):
- The defendant organization shall forfeit the defendant organization's interest in the following property to the United States:

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) fine principal, (5) fine interest, (6) community restitution, (7) penalties, and (8) costs, including cost of prosecution and court costs.

# UNITED STATES DISTRICT COURT

District of Puerto Rico

UNITED STATES OF AMERICA

v.

JOSEPH FUENTES-FERNANDEZ

**AMENDED JUDGMENT IN A CRIMINAL CASE**

Case Number: 3:22-CR-00182-1 (JAG)

USM Number: 02391-510

Peter Koski, Joaquin Monserrate-Matienzo & Jose Aguayo  
Defendant's Attorney

Date of Original Judgment: 8/26/2022  
(Or Date of Last Amended Judgment)

**Reason for Amendment:**

- Correction of Sentence on Remand (18 U.S.C. 3742(f)(1) and (2))
- Reduction of Sentence for Changed Circumstances (Fed. R. Crim. P. 35(b))
- Correction of Sentence by Sentencing Court (Fed. R. Crim. P. 35(a))
- Correction of Sentence for Clerical Mistake (Fed. R. Crim. P. 36)

- Modification of Supervision Conditions (18 U.S.C. §§ 3563(c) or 3583(e))
- Modification of Imposed Term of Imprisonment for Extraordinary and Compelling Reasons (18 U.S.C. § 3582(c)(1))
- Modification of Imposed Term of Imprisonment for Retroactive Amendment(s) to the Sentencing Guidelines (18 U.S.C. § 3582(c)(2))
- Direct Motion to District Court Pursuant  28 U.S.C. § 2255 or  18 U.S.C. § 3559(c)(7)
- Modification of Restitution Order (18 U.S.C. § 3664)

**THE DEFENDANT:**

- pleaded guilty to count(s) \_\_\_\_\_
- pleaded nolo contendere to count(s) \_\_\_\_\_ which was accepted by the court.
- was found guilty on count(s) \_\_\_\_\_ after a plea of not guilty.

The defendant is adjudicated guilty of these offenses:

Title & Section	Nature of Offense	Offense Ended	Count
18 U.S.C. § 1001(a)(1)	Scheme to Falsify and Conceal Material Facts.	11/3/2020	One

\_\_\_\_\_

The defendant is sentenced as provided in pages 2 through 7 of this judgment. The sentence is imposed pursuant to the Sentencing Reform Act of 1984.

- The defendant has been found not guilty on count(s) \_\_\_\_\_
- Count(s) \_\_\_\_\_  is  are dismissed on the motion of the United States.

It is ordered that the defendant must notify the United States Attorney for this district within 30 days of any change of name, residence, or mailing address until all fines, restitution, costs, and special assessments imposed by this judgment are fully paid. If ordered to pay restitution, the defendant must notify the court and United States attorney of material changes in economic circumstances.

10/3/2022  
Date of Imposition of Judgment

S/ Jay A. Garcia-Gregory

Signature of Judge  
Jay A. Garcia-Gregory Senior, U.S. District Judge

Name and Title of Judge

10/3/2022  
Date



DEFENDANT: JOSEPH FUENTES-FERNANDEZ T/N: Joseph An  
CASE NUMBER: 3:22-CR-00182-1 (JAG)

**IMPRISONMENT**

The defendant is hereby committed to the custody of the Federal Bureau of Prisons to be imprisoned for a total term of:

FOURTEEN (14) MONTHS.

The court makes the following recommendations to the Bureau of Prisons:  
(\* ) The defendant be designated to FCI Morgantown, West Virginia family live nearby.

The defendant is remanded to the custody of the United States Marshal.

The defendant shall surrender to the United States Marshal for this district:

at \_\_\_\_\_  a.m.  p.m. on \_\_\_\_\_ .

as notified by the United States Marshal.

The defendant shall surrender for service of sentence at the institution designated by the Bureau of Prisons: **10/26/2022 unless modified by the parties.**

as notified by the United States Marshal. \_\_\_\_\_ .

as notified by the Probation or Pretrial Services Office.

**RETURN**

I have executed this judgment as follows:

Defendant delivered on \_\_\_\_\_ to \_\_\_\_\_  
at \_\_\_\_\_ , with a certified copy of this judgment.

UNITED STATES MARSHAL

By \_\_\_\_\_  
DEPUTY UNITED STATES MARSHAL

DEFENDANT: JOSEPH FUENTES-FERNANDEZ T/N: Joseph An  
CASE NUMBER: 3:22-CR-00182-1 (JAG)

### SUPERVISED RELEASE

Upon release from imprisonment, you will be on supervised release for a term of:

THREE (3) YEARS.

### MANDATORY CONDITIONS

1. You must not commit another federal, state or local crime.
2. You must not unlawfully possess a controlled substance.
3. You must refrain from any unlawful use of a controlled substance. You must submit to one drug test within 15 days of release from imprisonment and at least two periodic drug tests thereafter, as determined by the court.
  - The above drug testing condition is suspended, based on the court's determination that you pose a low risk of future substance abuse. *(check if applicable)*
4.  You must make restitution in accordance with 18 U.S.C. §§ 3663 and 3663A or any other statute authorizing a sentence of restitution. *(check if applicable)*
5.  You must cooperate in the collection of DNA as directed by the probation officer. *(check if applicable)*
6.  You must comply with the requirements of the Sex Offender Registration and Notification Act (34 U.S.C. § 20901, *et seq.*) as directed by the probation officer, the Bureau of Prisons, or any state sex offender registration agency in the location where you reside, work, are a student, or were convicted of a qualifying offense. *(check if applicable)*
7.  You must participate in an approved program for domestic violence. *(check if applicable)*

You must comply with the standard conditions that have been adopted by this court as well as with any other conditions on the attached page.

DEFENDANT: JOSEPH FUENTES-FERNANDEZ T/N: Joseph An  
CASE NUMBER: 3:22-CR-00182-1 (JAG)

### STANDARD CONDITIONS OF SUPERVISION

As part of your supervised release, you must comply with the following standard conditions of supervision. These conditions are imposed because they establish the basic expectations for your behavior while on supervision and identify the minimum tools needed by probation officers to keep informed, report to the court about, and bring about improvements in your conduct and condition.

1. You must report to the probation office in the federal judicial district where you are authorized to reside within 72 hours of your release from imprisonment, unless the probation officer instructs you to report to a different probation office or within a different time frame.
2. After initially reporting to the probation office, you will receive instructions from the court or the probation officer about how and when you must report to the probation officer, and you must report to the probation officer as instructed.
3. You must not knowingly leave the federal judicial district where you are authorized to reside without first getting permission from the court or the probation officer.
4. You must answer truthfully the questions asked by your probation officer.
5. You must live at a place approved by the probation officer. If you plan to change where you live or anything about your living arrangements (such as the people you live with), you must notify the probation officer at least 10 days before the change. If notifying the probation officer in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
6. You must allow the probation officer to visit you at any time at your home or elsewhere, and you must permit the probation officer to take any items prohibited by the conditions of your supervision that he or she observes in plain view.
7. You must work full time (at least 30 hours per week) at a lawful type of employment, unless the probation officer excuses you from doing so. If you do not have full-time employment you must try to find full-time employment, unless the probation officer excuses you from doing so. If you plan to change where you work or anything about your work (such as your position or your job responsibilities), you must notify the probation officer at least 10 days before the change. If notifying the probation officer at least 10 days in advance is not possible due to unanticipated circumstances, you must notify the probation officer within 72 hours of becoming aware of a change or expected change.
8. You must not communicate or interact with someone you know is engaged in criminal activity. If you know someone has been convicted of a felony, you must not knowingly communicate or interact with that person without first getting the permission of the probation officer.
9. If you are arrested or questioned by a law enforcement officer, you must notify the probation officer within 72 hours.
10. You must not own, possess, or have access to a firearm, ammunition, destructive device, or dangerous weapon (i.e., anything that was designed, or was modified for, the specific purpose of causing bodily injury or death to another person such as nunchakus or tasers).
11. You must not act or make any agreement with a law enforcement agency to act as a confidential human source or informant without first getting the permission of the court.
12. If the probation officer determines that you pose a risk to another person (including an organization), the probation officer may require you to notify the person about the risk and you must comply with that instruction. The probation officer may contact the person and confirm that you have notified the person about the risk.
13. You must follow the instructions of the probation officer related to the conditions of supervision.

### U.S. Probation Office Use Only

A U.S. probation officer has instructed me on the conditions specified by the court and has provided me with a written copy of this judgment containing these conditions. For further information regarding these conditions, see *Overview of Probation and Supervised Release Conditions*, available at: [www.uscourts.gov](http://www.uscourts.gov).

Defendant's Signature \_\_\_\_\_

Date \_\_\_\_\_

DEFENDANT: JOSEPH FUENTES-FERNANDEZ T/N: Joseph An  
CASE NUMBER: 3:22-CR-00182-1 (JAG)

### SPECIAL CONDITIONS OF SUPERVISION

1. The defendant shall not commit another Federal, state, or local crime, and shall observe the standard conditions of supervised release recommended by the United States Sentencing Commission and adopted by this Court.
2. The defendant shall not unlawfully possess controlled substances.
3. The defendant shall refrain from possessing firearms, destructive devices, and other dangerous weapons.
4. The defendant shall provide the U.S. Probation Officer access to any financial information upon request.
5. The defendant shall pay the imposed fine as required by law during the period of supervision as directed by the Probation Officer and shall notify the U.S. Attorney's Office, as well as, the Probation Officer of any change of name or address that occurs before the full amount has been paid.
6. The defendant shall cooperate in the collection of a DNA sample as directed by the Probation Officer, pursuant to the Revised DNA Collection Requirements, and Title 18, U.S. Code Section 3563(a)(9).
7. Defendant shall submit his person, property, house, vehicle, papers, computers (as defined in 18 U.S.C. Section 1030 (e)(1)), other electronic communication or data storage devices, and media, to a search conducted by a United States Probation Officer at a reasonable time and in a reasonable manner, based upon reasonable suspicion of contraband or evidence of a violation of a condition of release. Failure to submit to a search may be grounds for revocation of release. The defendant shall warn any other occupants that the premises may be subject to searches pursuant to this condition.

DEFENDANT: JOSEPH FUENTES-FERNANDEZ T/N: Joseph An  
CASE NUMBER: 3:22-CR-00182-1 (JAG)

**CRIMINAL MONETARY PENALTIES**

The defendant must pay the total criminal monetary penalties under the schedule of payments on Sheet 6.

	<u>Assessment</u>	<u>Restitution</u>	<u>Fine</u>	<u>AVAA Assessment*</u>	<u>JVTA Assessment**</u>
<b>TOTALS</b>	\$ 100.00	\$ 0.00	\$ 0.00	\$ 0.00	\$ 0.00

The determination of restitution is deferred until \_\_\_\_\_. An *Amended Judgment in a Criminal Case (AO 245C)* will be entered after such determination.

The defendant must make restitution (including community restitution) to the following payees in the amount listed below.

If the defendant makes a partial payment, each payee shall receive an approximately proportioned payment, unless specified otherwise in the priority order or percentage payment column below. However, pursuant to 18 U.S.C. § 3664(i), all nonfederal victims must be paid before the United States is paid.

<u>Name of Payee</u>	<u>Total Loss***</u>	<u>Restitution Ordered</u>	<u>Priority or Percentage</u>
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<b>TOTALS</b>	\$ _____	0.00	\$ _____	0.00
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Restitution amount ordered pursuant to plea agreement \$ \_\_\_\_\_

The defendant must pay interest on restitution and a fine of more than \$2,500, unless the restitution or fine is paid in full before the fifteenth day after the date of the judgment, pursuant to 18 U.S.C. § 3612(f). All of the payment options on Sheet 6 may be subject to penalties for delinquency and default, pursuant to 18 U.S.C. § 3612(g).

The court determined that the defendant does not have the ability to pay interest and it is ordered that:

the interest requirement is waived for the  fine  restitution.

the interest requirement for the  fine  restitution is modified as follows:

\* Amy, Vicky, and Andy Child Pornography Victim Assistance Act of 2018, Pub. L. No. 115-299.

\*\* Justice for Victims of Trafficking Act of 2015, Pub. L. No. 114-22.

\*\*\* Findings for the total amount of losses are required under Chapters 109A, 110, 110A, and 113A of Title 18 for offenses committed on or after September 13, 1994, but before April 23, 1996.

DEFENDANT: JOSEPH FUENTES-FERNANDEZ T/N: Joseph Ant  
CASE NUMBER: 3:22-CR-00182-1 (JAG)

### SCHEDULE OF PAYMENTS

Having assessed the defendant's ability to pay, payment of the total criminal monetary penalties is due as follows:

- A  Lump sum payment of \$ 100.00 due immediately, balance due
  - not later than \_\_\_\_\_, or
  - in accordance with  C,  D,  E, or  F below; or
- B  Payment to begin immediately (may be combined with  C,  D, or  F below); or
- C  Payment in equal \_\_\_\_\_ (e.g., weekly, monthly, quarterly) installments of \$ \_\_\_\_\_ over a period of \_\_\_\_\_ (e.g., months or years), to commence \_\_\_\_\_ (e.g., 30 or 60 days) after the date of this judgment; or
- D  Payment in equal \_\_\_\_\_ (e.g., weekly, monthly, quarterly) installments of \$ \_\_\_\_\_ over a period of \_\_\_\_\_ (e.g., months or years), to commence \_\_\_\_\_ (e.g., 30 or 60 days) after release from imprisonment to a term of supervision; or
- E  Payment during the term of supervised release will commence within \_\_\_\_\_ (e.g., 30 or 60 days) after release from imprisonment. The court will set the payment plan based on an assessment of the defendant's ability to pay at that time; or
- F  Special instructions regarding the payment of criminal monetary penalties:

Unless the court has expressly ordered otherwise, if this judgment imposes imprisonment, payment of criminal monetary penalties is due during the period of imprisonment. All criminal monetary penalties, except those payments made through the Federal Bureau of Prisons' Inmate Financial Responsibility Program, are made to the clerk of the court.

The defendant shall receive credit for all payments previously made toward any criminal monetary penalties imposed.

Joint and Several

Case Number Defendant and Co-Defendant Names (including defendant number)	Total Amount	Joint and Several Amount	Corresponding Payee, if appropriate
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- The defendant shall pay the cost of prosecution.
- The defendant shall pay the following court cost(s):
- The defendant shall forfeit the defendant's interest in the following property to the United States:

Payments shall be applied in the following order: (1) assessment, (2) restitution principal, (3) restitution interest, (4) AVAA assessment, (5) fine principal, (6) fine interest, (7) community restitution, (8) JVTA assessment, (9) penalties, and (10) costs, including cost of prosecution and court costs.

# **EXHIBIT B**

# **EXHIBIT C**



# **EXHIBIT D**

**Elizabeth K. Lilienthal**

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**To:** Jessica F. Bymers  
**Subject:** RE: EXTERNAL: FW: Salvemos A Puerto Rico Amended Reports

**From:** Jacobson, Jonathan (CRM) <[Jonathan.Jacobson@usdoj.gov](mailto:Jonathan.Jacobson@usdoj.gov)>  
**Sent:** Thursday, August 11, 2022 1:14 PM  
**To:** Katherine N. Reynolds <[KReynolds@dickinson-wright.com](mailto:KReynolds@dickinson-wright.com)>  
**Cc:** Koski, Peter <[PKoski@cov.com](mailto:PKoski@cov.com)>  
**Subject:** RE: Salvemos A Puerto Rico Amended Reports

[EXTERNAL]  
 Hi Katie –

As long as you are transparent in your explanation with FEC about (1) and (2), that is fine with me.

Unfortunately, I cannot provide any further information on (3). I think you can just explain the circumstances to FEC and see how they wish to handle.

Thanks,

Jonathan

**From:** Katherine N. Reynolds <[KReynolds@dickinson-wright.com](mailto:KReynolds@dickinson-wright.com)>  
**Sent:** Wednesday, August 10, 2022 3:56 PM  
**To:** Jacobson, Jonathan (CRM) <[Jonathan.Jacobson@usdoj.gov](mailto:Jonathan.Jacobson@usdoj.gov)>  
**Cc:** Koski, Peter <[PKoski@cov.com](mailto:PKoski@cov.com)>  
**Subject:** [EXTERNAL] Salvemos A Puerto Rico Amended Reports

Jonathan—

I am following up regarding Joey's requirement to file amended FEC reports with the true donor information for Salvemos A Puerto Rico, pursuant to his and Salvemos' plea agreement. Based on our review, the following reports will be amended.

1. July Quarterly Report (2020)
2. Post-General Election Report (2020)
3. July Mid-Year Report (2021)

However, in filing these reports, we have a few follow-up questions.

1. For many of these donors, Joey does not have the information required by the FEC to file these reports, including donor addresses and employer/occupation information, as this information was not provided to him. Legally speaking, in the event this information is missing, the FEC requires the committee to use its best efforts to obtain this information, which requires the committee to request this information from donors within thirty days of receiving the contribution. However, Salvemos undoubtedly has exceeded that threshold. Therefore, our plan is to fill in missing information with "INFORMATION REQUESTED" unless there is any objection from DOJ (or unless DOJ can provide us with the required information).

2. Fundacion Pro Igualdad and Foundation for Progress did not directly transfer all the funds it received to Salvemos. For example, on June 22, Fundacion received \$200,000 from individual donors, but on June 25, 2020, Fundacion only transferred \$175,000 to Salvemos. Because of that, we are reporting the amount contributed from each donor based on an allocation percentage formula. Below provides an example. We plan to proceed with this reporting unless we receive an objection from DOJ.

6/22/2020 Jaap LLC	Elvin Pagan	\$	40,800	20%	?
	Luvian Rodriguez Robles/Evelyn and				
6/22/2020 Essential Insurance	Pereira Almestica/Marc Tacher		100,000	50%	?
6/22/2020 AP Engineering Inc.	Florida Entity-Unknown Representative		59,200	30%	?
			<u>200,000</u>	<u>100%</u>	
6/25/2020 →					

3. There are a couple of contributions that were made anonymously. For example, there is one contribution made on 10/26/2020 that was made with the Cashiers Check, where the donor was not identified. Under FEC regulations, committees are prohibited from reporting contributions as anonymous. Do you or the FBI have any information on the identity of this donor that we can include in the amended FEC report?

Thank you for your help, and let us know if you have any questions.

Best,  
Katie

**Katherine N. Reynolds Associate Attorney**

International Square  
1825 Eye St. N.W.  
Suite 900  
Washington, D.C. 20006

Phone 202-659-6944  
Fax 844-670-6009  
Email [KReynolds@dickinsonwright.com](mailto:KReynolds@dickinsonwright.com)

[Profile](#) [V-Card](#)

**DICKINSON WRIGHT**

ARIZONA CALIFORNIA FLORIDA ILLINOIS KENTUCKY MICHIGAN MISSOURI NEBRASKA  
OHIO TENNESSEE TEXAS WASHINGTON D.C. VIRGINIA

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# **EXHIBIT E**

**Elizabeth K. Lilienthal**

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**To:** Elizabeth K. Lilienthal  
**Subject:** RE: EXTERNAL: RE: Salvemos

**From:** Katherine N. Reynolds <KReynolds@dickinson-wright.com>  
**Sent:** Wednesday, January 18, 2023 7:49 PM  
**To:** Michael Beckman <MBeckman@fec.gov>  
**Subject:** Re: EXTERNAL: RE: Salvemos

Thanks, Michael! This is helpful.

If you don't mind, I'll give you a call tomorrow morning just to confirm what we need to do.

Katie

Sent from my iPhone

On Jan 18, 2023, at 5:30 PM, Michael Beckman <MBeckman@fec.gov> wrote:

Hello Katie,

While the matter involving Salvemos A Puerto Rico remains opened by the FEC's Office of General Counsel, the committee cannot be terminated. If the committee has no financial activity since its last filed report, the committee can file a statement of no activity which certifies on the public record that no additional financial activity has occurred during the applicable time period. If your law firm or the committee's designated agent has the ability to file reports electronically to the FEC, submitting these statements will satisfy the ongoing reporting requirements for the committee. As long as the statements of no activity are filed, the committee will not be questioned for missing the correct treasurer's signature and the committee will be excluded from the administrative fines program for non-filers.

If your firm does not have the access or ability to file reports electronically on behalf of the committee, the FEC may accept an emailed statement of no activity, which the FEC will post on the public record.

I have called and left a voicemail at your provided phone number this afternoon with this information. If you have further questions, please call me at 202-694-1185, as direct email communication is generally not accepted between committee representatives and Reports Analysis Division staff.

Thank you,

Michael Beckman  
Senior Campaign Finance & Reviewing Analyst  
Reports Analysis Division  
Federal Election Commission  
(202) 694-1185

**From:** Katherine N. Reynolds <[KReynolds@dickinson-wright.com](mailto:KReynolds@dickinson-wright.com)>  
**Sent:** Friday, December 16, 2022 11:18 AM  
**To:** Michael Beckman <[MBeckman@fec.gov](mailto:MBeckman@fec.gov)>  
**Subject:** Salvemos

Good morning—

I represent Salvemos A Puerto Rico. I am reaching out to see if there is any way we can terminate this committee early. While we recognize that there is an outstanding enforcement matter, the Treasurer, Joseph Fuentes, is currently serving time in prison, and therefore renders filing the necessary reports impossible.

The bank has also shut down the Salvemos account, and as such, is not receiving or spending any additional funds. We are happy to work with you to file a termination report.

Thanks,  
Katie

**Katherine N. Reynolds Associate Attorney**

International Square      Phone 202-659-6944  
1825 Eye St. N.W.      Fax 844-670-6009  
Suite 900  
Washington, D.C. 20006      Email [KReynolds@dickinsonwright.com](mailto:KReynolds@dickinsonwright.com)

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**DICKINSON WRIGHT** LLP

ARIZONA CALIFORNIA COLORADO FLORIDA GEORGIA ILLINOIS INDIANA IOWA KANSAS MARYLAND MASSACHUSETTS  
MICHIGAN MINNESOTA MISSISSIPPI MISSOURI NEBRASKA NEW YORK NORTH CAROLINA NORTH DAKOTA OHIO  
OKLAHOMA PENNSYLVANIA SOUTH CAROLINA TEXAS VIRGINIA WASHINGTON WISCONSIN WYOMING

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# **EXHIBIT F**



INTERNATIONAL SQUARE  
1825 EYE STREET, NW, SUITE 900  
WASHINGTON, DC 20006-5468  
TELEPHONE: 202-457-0160  
FACSIMILE: 844-670-6009  
<http://www.dickinsonwright.com>

KATHERINE N. REYNOLDS  
[KReynolds@dickinsonwright.com](mailto:KReynolds@dickinsonwright.com)  
202-659-6944

January 31, 2023

Federal Election Commission  
Reports and Analysis Division  
1050 First Street NE  
Washington, DC 20463

I am counsel for Salvemos A Puerto Rico (C00746594) and am writing to provide the Commission with confirmation that Salvemos A Puerto Rico has not received any contributions from October 1 to December 31, 2022. They have made limited administrative disbursements during that period, and those transactions are attached to this letter. This coverage period covers both the 2022 Post General Report and the 2022 Year End Report.

Please also note that Salvemos A Puerto Rico will not be engaging in any future political activity in which it should receive contributions or make disbursements.

Should you have any questions, please contact me at [kreynolds@dickinson-wright.com](mailto:kreynolds@dickinson-wright.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Katherine N. Reynolds' with a stylized flourish at the end.

Katherine N. Reynolds  
*Counsel to Salvemos A Puerto Rico*





Printed on: 2022-12-16 12:17:53

# Account Details

Business Checking-

## Available Now

\$0.00

## On Deposit

\$0.00

## Transaction History

- PERIOD 2022-09-01 - 2022-12-16

### Results for: Sep 1, 2022 to Dec 16, 2022

Date	Description	Debit	Credit
Dec 15, 2022	FEE-WIRE TRNFR	-\$17.00	
Dec 15, 2022	FUNDS TRN OUT CBOL WIRE TO Dickinson Wright PLLC #38852	-\$1,517.49	
Dec 08, 2022	SERVICE CHARGE ACCT ANALYSIS DIRECT DB	-\$15.00	
Nov 08, 2022	SERVICE CHARGE ACCT ANALYSIS DIRECT DB	-\$15.00	
Oct 11, 2022	SERVICE CHARGE ACCT ANALYSIS DIRECT DB	-\$15.00	
Sep 08, 2022	SERVICE CHARGE ACCT ANALYSIS DIRECT DB	-\$15.00	

Account activity is provided for your information only and is subject to revisions. It is not a substitute for your periodic statement, which is the official record of your account.

# **EXHIBIT G**



**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION**

**Office of the Clerk**

January 18, 2023

Joseph Fuentes

Arlington, VA, 22209

**RECEIPT**

RE: SALVEMOS A PUERTO RICO INC.  
ID: 08014557  
FILING NO: 2301185396003  
WORK ORDER NO: 202301183440017

Dear Customer:

This is your receipt for \$10.00 to cover the fee for filing articles of dissolution for a corporation with this office.

The effective date of the certificate is January 18, 2023.

If you have any questions, please call (804) 371-9733 or toll-free 1-866-722-2551.

Sincerely,

Bernard J. Logan  
Clerk of the Commission

Delivery Method: Email

**COMMONWEALTH OF VIRGINIA  
STATE CORPORATION COMMISSION**

AT RICHMOND, JANUARY 18, 2023

The State Corporation Commission has found the articles of dissolution submitted on behalf of

**SALVEMOS A PUERTO RICO INC.**

to comply with the requirements of law, and confirms payment of all required fees. Therefore, it is ORDERED that this

**CERTIFICATE OF DISSOLUTION**

be issued and admitted to record with the articles of dissolution in the Office of the Clerk of the Commission, effective January 18, 2023.

STATE CORPORATION COMMISSION

By 

Jehmal T. Hudson  
Commissioner

# **EXHIBIT H**

From: no\_reply\_email@f1hst.com [mailto:no\_reply\_email@f1hst.com]

Sent: Thursday, January 19, 2023 2:55 PM

To: joey@fuentes-fernandez.com

Subject: Thank you for using the Puerto Rico Department of State On-line Corporation System

Government of Puerto Rico

Registry of Corporations and Entities

**Withdrawal**

SALVEMOS A PUERTO RICO INC.

Regarding Order: 28150297

Submitted on: 19-Jan-2023

Dear Joseph Fuentes,

The Puerto Rico Department of State would like to thank you for filing the Withdrawal for SALVEMOS A PUERTO RICO INC..

You can view:

- the Payment Receipt with this link: [Payment Receipt](#)
- the Certificate of Withdrawal with this link: [Certificate of Withdrawal](#)
- the Articles of Withdrawal with this link: [Articles of Withdrawal](#)
- the uploaded supporting documents below:

[Corporate Resolution](#), Date Issued : 19-Jan-2023

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**DO NOT REPLY to this e-mail. If you have questions, please send a message to [support@estado.pr.gov](mailto:support@estado.pr.gov)**

Best regards,

Puerto Rico Department of State  
San José Street, Old San Juan

San Juan, Puerto Rico 00901  
Tel. (787) 722-2121 ext. 4402,4404  
[estado.pr.gov](http://estado.pr.gov)

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Gobierno de Puerto Rico

Registro de Corporaciones y Entidades

**Retiro**

SALVEMOS A PUERTO RICO INC.

Pedido: 28150297

Fecha: 19-ene-2023

Estimado(a) Joseph Fuentes,

El Departamento de Estado quiere agradecerle por haber radicado un/una Retiro para SALVEMOS A PUERTO RICO INC..

Usted puede ver:

- El Recibo de Pago a través de este enlace: [Recibo de Pago](#)
- El Certificado de Retiro a través de este enlace: [Certificado de Retiro](#)
- los Artículos de Retiro a través de este enlace: [Artículos de Retiro](#)
- Los documentos de apoyo subidos a continuación:

[Resolución Corporativa](#), Fecha de Emisión : 19-ene-2023

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**NO CONTESTE A este correo electrónico. Si tiene alguna pregunta, favor enviar mensaje por correo electrónico a [support@estado.pr.gov](mailto:support@estado.pr.gov)**

Atentamente,

Departamento de Estado de Puerto Rico  
Calle San José, Viejo San Juan  
San Juan, Puerto Rico 00901  
Tel. (787) -2121 ext 02,4404  
[estado.pr.gov](http://estado.pr.gov)

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