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UNITED STATES DEPARTMENT OF JUSTICE

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535

THIS IS THE END OF RUN # 954

Date Filmed 9/10/80 Camera No. 2

Camera Operator bpc

FEDERAL ELECTION COMMISSION

pre-negotiation agreement
has been removed

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

Condy Edwards
8/22/80

FEC 9-21-77

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20543

August 21, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis C. Benza, Esquire
Committee for the Re-Election of
Congressman Herman Badillo
1470 Shore Drive
Bronx, New York 10463

RE: HUR 954 (79)

Dear Mr. Benza:

Herein are the sixty-two (62) checks and assorted receipts from the Committee's '76 campaign that you left with this Office for review on November 15, 1979.

Sincerely,


Charles M. Steele
General Counsel

Enclosures

80040204210



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 13, 1980

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Louis C. Benza, Esquire
Committee for the Re-election of
Congressman Herman Badillo
1470 Shore Drive
Bronx, New York 10463

RE: MUR 954 (79)

Dear Mr. Benza:

On August 8, 1980, the Commission voted to terminate its investigation in MUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

However, the Commission reminds you that supporting documentation for expenditures and proper reporting of contributions and expenditures is essential for adhering to the provisions of the Federal Election Campaign Act of 1979, as amended.

Furthermore, it is illegal to accept contributions from corporations, banks, and labor organizations; therefore steps must be taken to insure that such prohibited contributions not be accepted in future campaigns.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles N. Steele
General Counsel

cc: Dr. Pedro L. Rodriguez

00040204219



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis C. Benza, Esquire
Committee for the Re-election of
Congressman Herman Badillo
1470 Shore Drive
Bronx, New York 10465

RE: MUR 954 (79)

Dear Mr. Benza:

On , 1980, the Commission voted to terminate its investigation in MUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

However, the Commission reminds you that supporting documentation for expenditures and proper reporting of contributions and expenditures is essential for adhering to the provisions of the Federal Election Campaign Act of 1979, as amended.

Furthermore, it is illegal to accept contributions from corporations, banks, and labor organizations; therefore steps must be taken to insure that such prohibited contributions not be accepted in future campaigns.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Dr. Pedro L. Rodriguez

60040304220

In the Matter of

Committee for the Re-Election
of Congressman Herman
Badillo, et al.

NOV 284 (79)

CONCILIATION AGREEMENT

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This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that the Committee for the Re-Election of Congressman Herman Badillo ("Respondent") violated: 2 U.S.C. § 432(d) for failure to retain supporting documentation for expenditures; 2 U.S.C. § 434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; and 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

③ 762

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

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

1. Respondent, Committee for the Re-Election of Congressman Herman Badillo, was the principal campaign committee of Herman Badillo in 1976.
2. Respondent in 1976 failed to retain supporting documentation for expenditures in violation of 2 U.S.C. § 432(d).
3. Respondent in 1976 failed to report payees for expenditure in excess of \$100.00 in violation of 2 U.S.C. § 434(b)(9) and (10).
4. Respondent in 1976 disbursed expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements in violation of 2 U.S.C. § 437b (a) and (b).

WHEREFORE, Respondent agrees:

1. That Respondent, Committee for the Re-Election of Congressman Herman Badillo, was the principal campaign committee of Herman Badillo in 1976.
2. That Respondent in 1976 did fail to retain supporting documentation for expenditures in violation of 2 U.S.C. § 432(d).

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Don

3. That Respondent in 1976 did fail to report payees for expenditure in excess of \$100.00 in violation of 2 U.S.C. § 434(b)(9) and (10).
4. That Respondent in 1976 did disburse expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements in violation of 2 U.S.C. § 437b(a) and (b).

VI. Respondent will pay a civil penalty to the Treasurer of the United States in the amount of Two Hundred and Fifty Dollars (\$250.00), pursuant to § 437g(a)(6)(B).

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, et seq.

GENERAL CONDITIONS

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.

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Handwritten signature

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

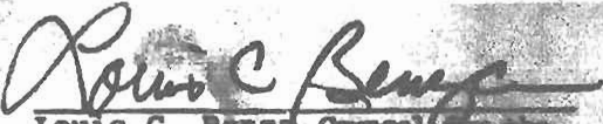
X. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

12 August 1980
Date



Charles N. Steele
General Counsel
Federal Election Commission

4/30/80
Date



Louis C. Bensa, Counsel for the
Committee for the Re-Election
of Congressman Herman Badillo

02/24



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 13, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George N. Kirschenbaum,
Assistant General Counsel
Washable Clothing, Sportswear
and Novelty Workers Union
33 West 14th Street
New York, New York 10011

RE: MUR 954 (79)

Dear Mr. Kirschenbaum:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

30040204225



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George N. Kirschenbaum,
Assistant General Counsel
Washable Clothing, Sportswear
and Novelty Workers Union
33 West 14th Street
New York, New York 10011

RE: MUR 954 (79)

Dear Mr. Kirschenbaum:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

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If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

0040204226



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 18, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott E. Mollen, Esquire
Lipsig, Sullivan, Mollen &
Liapakis P.C.
100 Church Street
New York, New York 10007

RE: MUR 954 (79)

Dear Mr. Mollen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles E. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040304227



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott E. Mollen, Esquire
Lipsig, Sullivan, Mollen &
Liapakis P.C.
100 Church Street
New York, New York 10007

RE: MUR 954 (79)

Dear Mr. Mollen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040204228



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 12, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Vite, President
Union Federal Savings and
Loan Association of New York
200 E. 23rd Street
New York, New York 10010

RE: MUR 954 (79)

Dear Mr. Vite:

The Commission voted to terminate its investigation in MUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles E. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

30040204229



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Vite, President
Union Federal Savings and
Loan Association of New York
200 E. 23rd Street
New York, New York 10010

RE: MUR 954 (79)

Dear Mr. Vite:

The Commission would to terminate its investigation in MUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040204230



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 13, 1980

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Sol Bogen, Esquire
Attorney At Law
One Penn Plaza
New York, New York 10001

RE: MUR 954 (79)

Dear Mr. Bogen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)-523-4060.

Sincerely,


Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

Nathan Katz
Pocket book and Novelty
Workers Union



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sol Bogen, Esquire
Attorney At Law
One Penn Plaza
New York, New York 10001

RE: MUR 954 (79)

Dear Mr. Bogen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

Nathan Katz
Pocket book and Novelty
Workers Union

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael F. Youdouin, Esquire
Vincent & Schickler
Counsel at Law
225 Broadway
New York, New York 10007

RE: MUR 954 (79)

Dear Mr. Youdouin:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles W. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040204233



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20542

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael P. Youdouin, Esquire
Vincent & Schickler
Counsel at Law
225 Broadway
New York, New York 10007

RE: MUR 954 (79)

Dear Mr. Youdouin:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

30040304234



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 13, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Irwin G. Cantor, President
IGC, P.C.
919 Third Avenue
New York, New York 10022

RE: MUR 954 (79)

Dear Mr. Cantor:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

50040204235



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20541

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Irwin G. Cantor, President
IGC, P.C.
919 Third Avenue
New York, New York 10022

RE: MUR 954 (79)

Dear Mr. Cantor:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James S. Anchin
Certified Public Accountants
270 Madison Avenue
New York, New York 10016

RE: MUR 954 (79)

Dear Mr. Anchin:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles H. Stearns
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

30040204237



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James S. Anchin
Certified Public Accountants
270 Madison Avenue
New York, New York 10016

RE: MUR 954 (79)

Dear Mr. Anchin:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040204238



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 17, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F.J. Spadafora
Vice President & Controller
United American Bank
50 Broadway
New York, New York 10004

RE: MUR 954 (79)

Dear Mr. Spadafora:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,



Charles R. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040204239



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

P.J. Spadaform
Vice President & Controller
United American Bank
50 Broadway
New York, New York 10004

RE: MUR 954 (79)

Dear Mr. Spadaform:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040204240



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 22, 1974

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Theodore P. Cohen
Vice President and General Counsel
Banco Popular De Puerto Rico
Banco Popular Building
7 West 51st Street
New York, New York 10019

RE: MUR 954 (79)

Dear Mr. Cohen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles H. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040204241



FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Theodore F. Cohen
Vice President and General Counsel
Banco Popular De Puerto Rico
Banco Popular Building
7 West 51st Street
New York, New York 10019

RE: MUR 954 (79)

Dear Mr. Cohen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

60040304242

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 12, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stanley M. Berman, Esquire
Cohen, Weiss and Simon
Counselors at Law
605 Third Avenue
New York, New York 10016

RE: MUR 954 (79)

Dear Mr. Berman:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles W. Schale
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

Joseph Trerotola
Joint Council 16

0040304243

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D. C. 20535

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stanley M. Berman, Esquire
Cohen, Weiss and Simon
Counselors at Law
605 Third Avenue
New York, New York 10016

RE: MUR 954 (79)

Dear Mr. Berman:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

Joseph Trerotola
Joint Council 16



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 13, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack Schwartz
Senior Vice President
Equitable Federal Savings
and Loan Association
356 Fulton Street at Borough Hall
Brooklyn, New York 11201

RE: MUR 954 (79)

Dear Mr. Schwartz:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,


Charles H. Stenice
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

30040304245



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack Schwartz
Senior Vice President
Equitable Federal Savings
and Loan Association
356 Fulton Street at Borough Hall
Brooklyn, New York 11201

RE: MUR 954 (79)

Dear Mr. Schwartz:

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If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

30040204246



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

August 15, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis C. Benza, Regaire
Friends of Herman Badillo
1470 Shore Drive
Bronx, New York 10465

RE: NUR 954 (79)

Dear Mr. Benza:

On August 8, 1980, the Commission voted to terminate its investigation in NUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that it is illegal for any political committee to accept contributions from corporations, banks, and labor organizations; therefore steps must be taken to insure that such prohibited contributions not be accepted in future campaigns.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Stennis
General Counsel

cc: Dr. Pedro L. Rodriguez

80040304247



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis C. Benza, Esquire
Friends of Herman Badillo
1470 Shore Drive
Bronx, New York 10463

RE: MUR 954 (79)

Dear Mr. Benza:

On , 1980, the Commission voted to terminate its investigation in MUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that it is illegal for any political committee to accept contributions from corporations, banks, and labor organizations; therefore steps must be taken to insure that such prohibited contributions not be accepted in future campaigns.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Dr. Pedro L. Rodriguez

80040304248

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Committee for the Re-election
of Congressman Herman Badillo,
et al.

MUR 954

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on August 8, 1980, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 954:

1. Approve the Conciliation Agreement as attached to the General Counsel's August 4, 1980 report.
2. Send the letters, as attached to the above-named report, and a copy of the signed Conciliation Agreement.
3. Take no further action against the Committee for the Re-Election of Congressman Herman Badillo for violations of 2 U.S.C. §441b.
4. Take no further action against the Friends of Herman Badillo concerning violations of 2 U.S.C. §441b.
5. Take no further action against the Pocketbook and Novelty Workers Union; Joint Council No. 16 International Brotherhood of Teamsters; the Washable Clothing, Sportswear and Novelty Workers Local 169 Amalgamated Clothing Workers; United American Bank; Union Federal Savings and Loan Association of New York; Equitable Federal Savings and

(Continued)

CONFIDENTIAL

General Counsel's Report

Dated August 4, 1980

Loan Association of New York; Banco Popular de Puerto Rico; Casino Sinaloa; Piacentini and Pared, P.C.; and Quality Company; and POC, P.C. concerning the refunded prohibited campaign contributions.

6. Take no further action against Lipalg, Sullivan, Mollen and Lispekis, P.C.
7. CLOSE THE FILE.
8. Approve and send the letters as attached to the above-named report.

Voting for this determination were Commissioners

Aikens, Friedersdorf, Harris, McGarry, Reiche, and Tiernan.

Attest:

8/11/80
Date

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

Received in Office of the Commission Secretary: 8-4-80, 12:27
Circulated on 48 hour vote basis: 8-4-80, 4:00

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mvE*
FROM: MARJORIE N. EDMONS/MARGARET CHERRY *mc*
DATE: AUGUST 11, 1980
SUBJECT: WITHDRAWAL OF OBJECTION TO MUR 954

Your office was notified on August 5, 1980 of an objection by Commissioner Reiche to MUR 954.

At 4:13, August 8, 1980, Commissioner Reiche withdrew his objection and cast an affirmative vote. A copy of Commissioner Reiche's memorandum is attached. Also attached is the certification approval.

ATTACHMENTS:

1. Copy of memo
2. Certification

00040304251

MEMORANDUM

TO: Commission Secretary

FROM: Commissioner Frank P. Reiche

DATE: August 8, 1980

SUBJECT: MUR 954

I wish to withdraw my objection to the recommendations made in the General Counsel's report dated August 4, 1980. Please record me as voting in favor of those recommendations.

Frank P. Reiche

80040204252

TO: CHIEF OF POLICE

FROM: MARVIN E. BROWN, Chairman

DATE: AUGUST 3, 1980

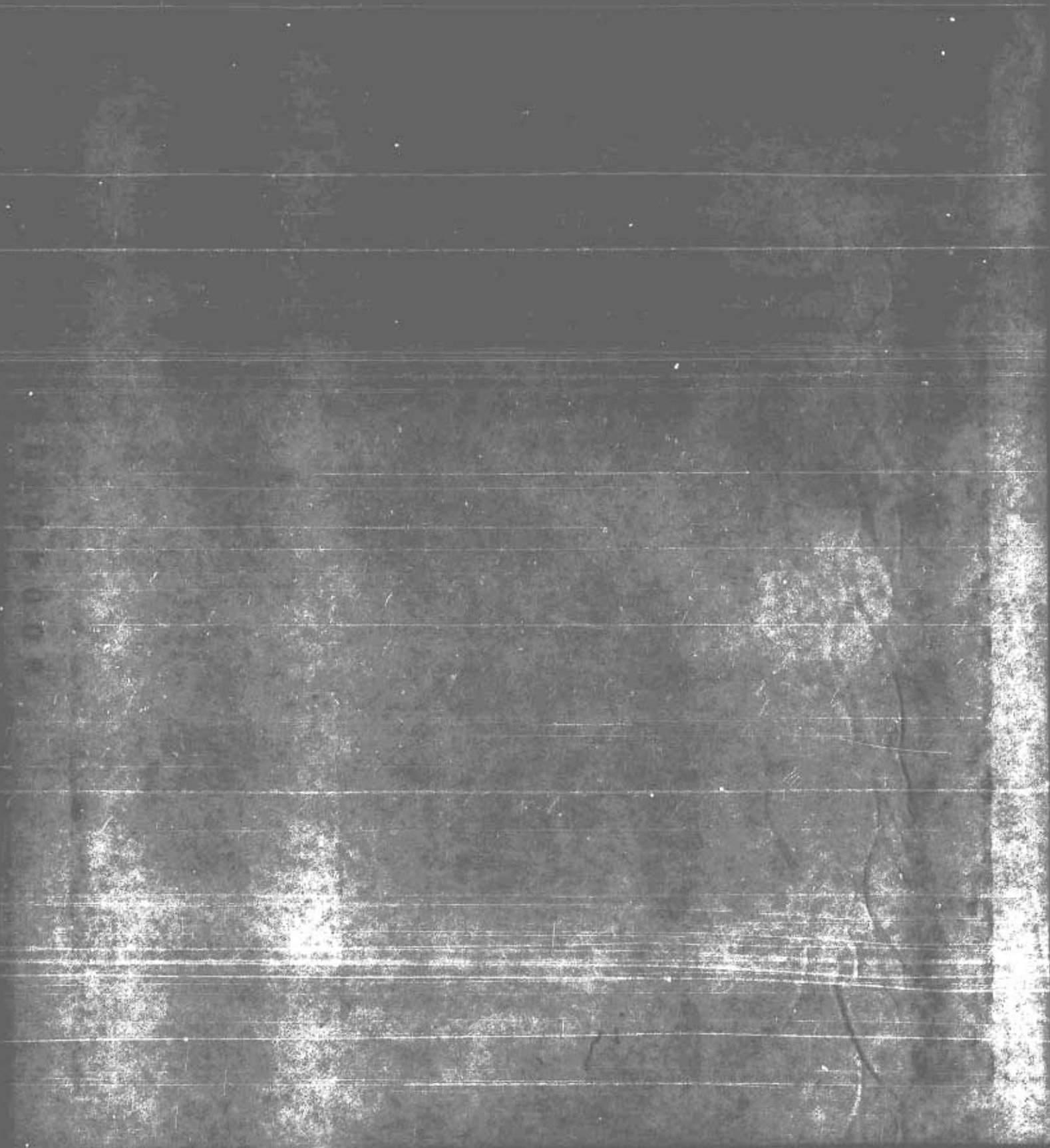
SUBJECT: OBJECTION - 800 124 - Criminal Complaint
Report filed 8-2-80; Received
8-3-80, 11:20

The above-named document was circulated on a
four vote basis at 3:00, August 4, 1980.

Commissioner Peiche submitted an objection on
August 5, 1980.

This matter will be placed on the Executive Session
Agenda for Tuesday, August 19, 1980.

000407042



In the Matter of

Committee for the Re-election of Congressman Herman Badillo, et al.

COMMISSION GENERAL'S REPORT

I. History of Case

This matter was initiated internally pursuant to audit findings resulting from the audit of the Committee for the Re-Election of Congressman Badillo ("the Committee"), the principal campaign committee of Herman Badillo and the Friends of Herman Badillo ("FOHB") a separate political committee established on behalf of Mr. Badillo's candidacy.

On June 20, 1979, the Commission found reason to believe that in 1976 the Committee violated: former 2 U.S.C. § 432(d) for failure to retain supporting documentation for expenditures, former 2 U.S.C. § 434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; former 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements; and 2 U.S.C. § 441b by accepting a labor union contribution from the Pocketbook and Novelty Workers Union.

In addition, the Commission found reason to believe that the Friends of Herman Badillo violated 2 U.S.C. § 441b by receiving and accepting contributions from various corporations, labor unions and national banks. Furthermore, the Commission

found reason to believe that various corporations, labor unions, and national banks violated 2 U.S.C. § 341b by making the illegal contributions.

On February 5, 1980, the Commission voted to reject the General Counsel's recommendation to take no further action and to close the file. Furthermore, the Commission voted to seek a five hundred dollar (\$500.00) civil penalty in this matter.

Although it was unclear at that time and the Certification does not specify, it was the Office of General Counsel's understanding that the Commission rejected only the recommendations concerning the cash expenditures and that no vote was taken concerning the prohibited campaign contributions. Attachment I.

Pursuant to this understanding, the Office of General Counsel drafted a proposed Conciliation Agreement containing only the cash expenditure violations. ^{1/}

On February 5, 1980, and again on February 12, 1980, a member of the General Counsel's staff informed Louis C. Benza, Respondent's counsel, of the Commission's decision to assess a civil penalty.

On each occasion Mr. Benza indicated a willingness to pay a civil penalty in order to resolve the matter.

On February 26, 1980, this Office received a letter from Mr. Benza counteroffering \$250.00 to the Commission's proposed civil penalty of \$500.00. Attachment II.

^{1/} This proposed Agreement was approved by the Commission on April 15, 1980.

On April 15, 1980, the Commission found the Respondent's counteroffer of \$250.00 acceptable, and the letter of notification together with the proposed Conciliation Agreement were mailed on April 16, 1980. The Agreement included in its provisions a civil penalty of \$250.00. Attachment III.

On May 5, 1980, this Office received from the Respondent's counsel the signed Agreement together with Respondent's check in the amount of \$250.00. Attachments IV, V and VI.

In light of the above, the Office of General Counsel recommends that the signed Agreement containing admissions of election law violations along with the civil penalty in the amount of \$250.00 be accepted.

II. Analysis

A. Prohibited Campaign Contributions

2 U.S.C. § 441b states it is unlawful for any corporation whatever or any labor organization to make a contribution or expenditure in connection with any election for Federal office or for any candidate, political committee or the other person to knowingly accept or receive such a contribution.

The Committee received and accepted prohibited campaign contributions totaling \$3,050.00 from twelve labor unions, banking, and corporate entities; thirteen (13) of the fourteen (14) prohibited campaign contributions were in amounts of one hundred dollars (\$100) or more. The Committees have made every effort to comply with the Audit recommendations by the refunding of all campaign contributions drawn on a prohibited bank account, and the Commission has received documentation from either the committee or the respondents indicating refunds to eleven (11) of the twelve (12) entities involved.

30040204257

In light of the above and consistent with prior action, the Office of General Counsel recommends no further action be taken concerning these refunded 1974 and 1977 prohibited campaign contributions.

As to Lipsig, Sullivan, Mollen and Liapakis, P.C., the Respondent asserts that the contribution was not drawn from a corporate account. On November 5, 1979, this Office received a communication from the respondent explaining that the check was, in fact, drawn from a non-repayable drawing account. Attachments VII and VIII. Based on the foregoing, we recommend no further action be taken against Lipsig, Sullivan, Mollen and Liapakis, P.C.

Recommendations

1. Approve the attached Conciliation Agreement.
2. Send the attached letters and a copy of the signed Conciliation Agreement.
3. Take no further action against the Committee for the Re-Election of Congressman Herman Badillo for violations of 2 U.S.C. § 441b.
4. Take no further action against the Friends of Herman Badillo concerning violations of 2 U.S.C. § 441b.
5. Take no further action against the Pocketbook and Novelty Workers Union; Joint Council No. 16 International Brotherhood of Teamsters; the Washable Clothing, Sportswear and Novelty Workers Local 169 Amalgamated Clothing Workers; United American Bank; Union Federal Savings and Loan Association of

0004030425

New York; Available Federal Letters New York; Available Federal Letters
New York; Bureau Regular As Bureau New York; Bureau Regular As Bureau
and Feder, P.C.; WAC Realty Company; and WAC, P.C. regarding the
refunded prohibited campaign contributions.

6. Take no further action against Lipsig, Williams, Sullivan
and Liapakis, P.C.

7. Close the file.

8. Approve and send attached letters.

4 August 1960
Date


Charles N. Steele
General Counsel

Attachments

Attachment I, II, III, IV, V, VI, VII and VIII
Letters (13)

00040204259

In the Matter of)
Committee for the Re-Election of)
Congressman Herman Badillo,)
et. al.)

MUR 954 (79)

CERTIFICATE

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission's Executive Session on February 5, 1980, do hereby certify that the Commission decided by a vote of 6-0 to reject the recommendation contained in the General Counsel's January 30, 1980 report on MUR 954 (79), and seek a civil penalty of Five Hundred Dollars in this matter.

Attest:

2/8/80
Date

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

REPORT THE FEDERAL ELECTION COMMISSION

In the Matter of

Committee for the Re-election
of Herman Badillo et al.

MUR 954

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal
Election Commission, do hereby certify that on April 15,
1980, the Commission decided by a vote of 5-0 to take
the following actions regarding MUR 954:

1. Find the Committee for the Re-election
of Congressman Herman Badillo's counter-
offer of \$250.00 acceptable.
2. Send the letter and proposed Conciliation
Agreement, as attached to the Memorandum
to the Commission dated April 10, 1980.

Voting for this determination were Commissioners
Aikens, Friedersdorf, Harris, McGarry, and Reiche.

Attest:

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 4-10-80, 4:52
Circulated on 48 hour vote basis: 4-11-80, 2:00

ATTACHMENT III

2:53

507839

April 30, 1969

Mr. Charles W. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

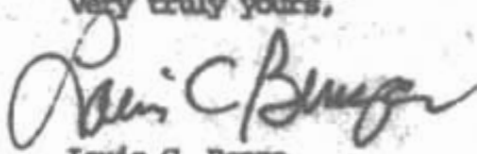
RE: MER 954 (79)
Committee for the Re-election
of Congressman Herman Badillo

Dear Mr. Steele:

Enclosed please find executed original of the Conciliation Agreement for the above caption MER. I have also enclosed a check from the Committee for the Re-election of Congressman Herman Badillo in the amount of \$250.00 payable to the U.S. Treasury.

I will appreciate your forwarding to me an executed copy of same.

Very truly yours,



Louis C. Benza

LCB
cc: Mr. Conley Edwards, Jr.
Dr. Pedro Rodriguez

FEDERAL ELECTION COMMISSION

2:53

In the Matter of

Committee for the Re-Election of
Congressman Herman
Badillo, et al.

MOE 934 (79)

CONCILIATION AGREEMENT

30040204263

This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that the Committee for the Re-Election of Congressman Herman Badillo ("Respondent") violated: 2 U.S.C. § 432(d) for failure to retain supporting documentation for expenditures; 2 U.S.C. § 434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; and 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

- 762
- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).
 - II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Respondent, Committee for the Re-Election of Congressman Herman Badillo, was the principal campaign committee of Herman Badillo in 1976.
2. Respondent in 1976 failed to retain supporting documentation for expenditures in violation of 2 U.S.C. § 432(d).
3. Respondent in 1976 failed to report payees for expenditure in excess of \$100.00 in violation of 2 U.S.C. § 434(b)(9) and (10).
4. Respondent in 1976 disbursed expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements in violation of 2 U.S.C. § 437b (a) and (b).

WHEREFORE, Respondent agrees:

1. That Respondent, Committee for the Re-Election of Congressman Herman Badillo, was the principal campaign committee of Herman Badillo in 1976.
2. That Respondent in 1976 did fail to retain supporting documentation for expenditures in violation of 2 U.S.C. § 432(d).

3. That Respondent in 1976 did fail to report
payee for expenditure in excess of \$100.00
in violation of 2 U.S.C. § 437b(5) and (12).
4. That Respondent in 1976 did disburse expendi-
tures for non-petty cash purposes by means other
than through the use of a campaign depository
and by not maintaining a record of petty cash
disbursements in violation of 2 U.S.C. § 437b(a)
and (b).

VI. Respondent will pay a civil penalty to the Treasurer
of the United States in the amount of Two Hundred
and Fifty Dollars (\$250.00), pursuant to § 437g(a)
(6)(B).

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, et seq.

GENERAL CONDITIONS

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 re-
quirement thereof has been violated, it may institute
a civil action for relief in the United States
District Court for the District of Columbia.

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

19. It is agreed that respondent shall have no more than thirty (30)-days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

80040304266
Date

4/30/80

Date

Charles N. Steele
General Counsel
Federal Election Commission

Louis C. Benza
Louis C. Benza, Counsel for the
Committee for the Re-Election
of Congressman Herman Badillo

OK Jan.

COMMITTEE FOR THE RE-ELECTION OF CONGRESSMAN JAMES H. HANCOCK

18187

PLEASE INSERT YOUR ACCOUNT NUMBER

42 006 195

1-102
210

PAY TO THE
ORDER OF

U.S. TREASURY

\$ 250.00

Two Hundred & Fifty \$100-

DOLLARS



BANKERS TRUST COMPANY

1545 AVENUE OF THE AMERICANS

NEW YORK, N. Y. 10019

76

Richard L. Han

• 0021001033 •

ALL INFORMATION CONTAINED
HEREIN IS UNCLASSIFIED
DATE 08-01-2008 BY 60322 UCBAW

THE UNIVERSITY OF CHICAGO
CHICAGO, ILL. 60637
U.S.A.

[illegible]

RECEIVED
JAN 20 1964
U.S. AIR FORCE

RECEIVED JUL 25 1964

● 2008年10月1日

RECEIVED
U.S. DEPARTMENT OF JUSTICE
FEB 10 1964

BRANDS
Globe, Inc.

NEW ORLEANS 541122

FROSTBERRY T. FILLMORE
ST. MARTIN, N.Y.

October 31, 1979

Hon. Connelly Edwards
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20464

Re: Contributions to the Campaign
of Herman Badillo

Dear Mr. Edwards:

This is to confirm our prior telephone conversation of last week in connection with the above-referenced matter.

The contributions referred to in our prior communications are derived from non-repayable drawing accounts which are established for the partners to draw against their personal salary and their share of the profits.

For the purposes of illustration, if I had brought in a case which has been settled for \$45,000. and the firm earns a fee of \$15,000., under my agreement with the firm I would be entitled to a share equal to \$5,000. of the fee. This \$5,000. is at such point my personal money to dispose of as I see fit. Thus, if I make a campaign contribution of \$1,000. from the \$5,000. in such account, this \$1,000. contribution is not repayable to me by the firm but is considered as a personal expenditure.

It appears that In Volume 4, Issue #8, of the FEC record dated September 19, 1978, such contribution would be deemed an individual contribution as a "non-repayable" drawing account.

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

I am writing you, as I have previously stated, the funds
represented by the corporate check are derived in the following
manner. I can assure you that having been obtained in your
office as to the questions which arise from utilization of the
corporate check, these contributions will only be made as
individual checks. However, as is evident from the foregoing,
there was certainly no intent to circumvent pertinent rules and
I do not believe that there has been a violation of pertinent rules.

Again, your time and consideration are most sincerely
appreciated.

Very truly yours

SCOTT E. POLLEN

SEN/mt

00040304269



THE FEDERAL ELECTION COMMISSION RECORD

Volume 4, Number 9

September 1978

INFORMATION

Under this heading, the Record periodically summarizes new developments of general interest to candidates for Federal office and committees which support such candidates.

TREATMENT OF PROHIBITED CONTRIBUTIONS

The Commission recently approved a Notice to all candidates and committees regarding its policy on the making and acceptance of corporate and labor organization contributions. In the course of carrying out its supervisory responsibilities, the Commission has noted many instances of candidates and/or committees accepting these contributions. Under the Act, corporations and labor organizations are prohibited from making contributions (or expenditures) in connection with Federal elections. Candidates and committees are prohibited from accepting or receiving such contributions.

In the past, the Commission has usually regarded the refunding of a prohibited contribution within a reasonable time as voluntary compliance with the Act. In such instances, no enforcement action, such as a civil penalty, was taken against the contributor or the recipient. During this election year and in the future, however, the Commission will not only require that the illegal corporate or labor organization contribution be refunded but, in appropriate circumstances, will also assess a civil penalty against the contributor and/or the recipient.

Candidates and committees are urged to be especially careful in accepting contributions from possible illegal sources. The regulations set out a procedure for handling such contributions (11 CFR 103.3(b)). (For a discussion of this

procedure, see the Record, April 1978, p. 6.) Candidates and committees should review this procedure and exercise "close scrutiny and careful investigation of any suspect contribution."

To assist candidates and committees in complying with this provision of the Act, the Notice clarifies the difference between three types of corporate accounts used by employees:

1. **Repayable Drawing Accounts.** Contributions from an account on which an employee may draw, but must later repay, are considered corporate contributions for the period that the draw is outstanding. Therefore, such contributions are prohibited.
2. **Nonrepayable Drawing Accounts.** Contributions from a nonrepayable drawing account, established to permit an employee to draw against his/her salary, profits or commissions, are considered personal contributions of the employee. Such contributions are lawful and are subject to the individual contribution limitations.
3. **Expense Accounts.** Contributions from expense accounts funded by a corporation are prohibited.

EXTENDED OFFICE HOURS

Between September 5, 1978, and the General Election, November 7, 1978, the Commission's Office of Public Communications will maintain extended office hours to accommodate calls from candidates and committees in Western time zones. Information Specialists will be available between 9:00 a.m. and 7:30 p.m., Eastern time. During these hours, candidates and committees may call toll-free, 800/424-9530, for information about the Act and regulations. Copies of reporting forms and publications may also be ordered.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Louis C. Benza, Esquire
Committee for the Re-election of
Congressman Herman Badillo
1470 Shore Drive
Bronx, New York 10465

RE: NUR 954 (79)

Dear Mr. Benza:

On , 1980, the Commission voted terminate its investigation in NUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

However, the Commission reminds you that supporting documentation for expenditures and proper reporting of contributions and expenditures is essential for adhering to the provisions of the Federal Election Campaign Act of 1979, as amended.

Furthermore, it is illegal to accept contributions from corporations, banks, and labor organizations; therefore steps must be taken to insure that such prohibited contributions not be accepted in future campaigns.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Dr. Pedro L. Rodriguez

30040704271



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Vite, President
Union Federal Savings and
Loan Association of New York
200 E. 23rd Street
New York, New York 10010

RE: MUR 954 (79)

Dear Mr. Schwartz:

The Commission voted to terminate its investigation in MUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles W. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040304272

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis C. Benza, Esquire
Friends of Herman Badillo
1470 Shore Drive
Bronx, New York 10463

RE: MUR 954 (79)

Dear Mr. Benza:

On . . . 1980, the Commission voted to terminate its investigation in MUR 954 (79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that it is illegal for any political committee to accept contributions from corporations, banks, and labor organizations; therefore steps must be taken to insure that such prohibited contributions not be accepted in future campaigns.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Dr. Pedro L. Rodriguez

00040204273



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott E. Mollen, Esquire
Lipsig, Sullivan, Mollen &
Liapakis P.C.
100 Church Street
New York, New York 10037

RE: MUR 954 (79)

Dear Mr. Mollen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040304274



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

George N. Kirschenbaum,
Assistant General Counsel
Washable Clothing, Sportswear
and Novelty Workers Union
33 West 14th Street
New York, New York 10011

RE: MUR 954 (79)

Dear Mr. Kirschenbaum:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

30040204275



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Sol Bogen, Esquire
Attorney At Law
One Penn Plaza
New York, New York 10001

RE: MUR 954 (79)

Dear Mr. Bogen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

Nathan Katz
Pocket book and Novelty
Workers Union

80040304276



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Jack Schwartz
Senior Vice President
Equitable Federal Savings
and Loan Association
356 Fulton Street at Borough Hall
Brooklyn, New York 11201

RE: MUR 954 (79)

Dear Mr. Schwartz:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040304277



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stanley M. Berman, Esquire
Cohen, Weiss and Simon
Counselors at Law
605 Third Avenue
New York, New York 10016

RE: MUR 954 (79)

Dear Mr. Berman:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

Joseph Trerotola
Joint Council 16

60040204278

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Theodore P. Cohen
Vice President and General Counsel
Banco Popular De Puerto Rico
Banco Popular Building
7 West 51st Street
New York, New York 10019

RE: MUR 954 (79)

Dear Mr. Cohen:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

0040304279



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F.J. Spadaform
Vice President & Controller
United American Bank
50 Broadway
New York, New York 10004

RE: MUR 954 (79)

Dear Mr. Spadaform:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040204200



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

James S. Anchin
Certified Public Accountants
270 Madison Avenue
New York, New York 10016

RE: MUR 954 (79)

Dear Mr. Anchin:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040204281



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Irwin G. Cantor, President
IGC, P.C.
919 Third Avenue
New York, New York 10022

RE: MUR 954 (79)

Dear Mr. Cantor:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040004202

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael P. Youdoun, Esquire
Vincent & Schickler
Counsel at Law
225 Broadway
New York, New York 10007

RE: MUR 954 (79)

Dear Mr. Youdoun:

The Commission voted to terminate its investigation in MUR 954(79). Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

60040201293

4 Mr. Louis C. Benza
1470 Shore Drive
Bronx, NY 10465



Mr. Charles N. Steele
General Counsel
Federation Election Commission
Washington, D.C. 20463



April 30, 1980

Mr. Charles H. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: HCR 154 (79)
Committee for the Re-election
of Congressman Herman Badillo

Dear Mr. Steele:

Enclosed please find executed original of the Conciliation Agreement for the above caption HCR. I have also enclosed a check from the Committee for the Re-election of Congressman Herman Badillo in the amount of \$250.00 payable to the U.S. Treasury.

I will appreciate your forwarding to me an executed copy of same.

Very truly yours,

Louis C. Benza
Louis C. Benza

LCB
cc: Mr. Conley Richards, Jr.
Dr. Pedro Rodriguez

COMMITTEE FOR THE RE-ELECTION OF CONGRESSMAN HERMAN BADILLO

18187

PLEASE INSERT YOUR ACCOUNT NUMBER

42 006 195

1-103
210

PAY TO THE
ORDER OF

U.S. TREASURY

\$ 250.00

00

Two Hundred & Fifty & 100--

DOLLARS



BANKERS TRUST COMPANY
1345 AVENUE OF THE AMERICAS
NEW YORK, N. Y. 10019

78

Herman Badillo

MEMO

⑆021001033⑆

Mr. Charles M. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

RE: MR 954 (79)
Committee for the Re-election
of Congressman Herman Badillo

Dear Mr. Steele:

Enclosed please find executed original of the Conciliation Agreement for the above caption MR. I have also enclosed a check from the Committee for the Re-election of Congressman Herman Badillo in the amount of \$250.00 payable to the U.S. Treasury.

I will appreciate your forwarding to me an executed copy of same.

807859

Very truly yours,

Louis C. Benza
Louis C. Benza

LCB
cc: Mr. Conley Edwards, Jr.
Dr. Pedro Rodriguez

80 MAY 6 4:10:16

RECEIVED
OFFICE OF THE
GENERAL COUNSEL



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

April 15, 1980

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis C. Benza, Esquire
Committee for the Re-Election
of Congressman Herman Badillo
1470 Shore Drive
Bronx, New York 10465

RE: MUR 954(79)

Dear Mr. Benza:

On April 15, 1980, the Commission found your counter-offer of \$250.00 acceptable. Enclosed is the Commission's proposed Conciliation Agreement for your consideration. If you accept the terms of the Agreement, please sign and mail it along with a check for Two Hundred-Fifty Dollars, payable to the United States Treasury, within ten days of your receipt of this letter.

Should you have any questions concerning this matter, please feel free to contact Conley Edwards, Jr., at (202) 523-4060.

Sincerely,


Charles N. Steele
General Counsel

Enclosure:
Conciliation Agreement

80040304208



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis C. Benza, Requirs
Committee for the Re-Election
of Congressman Hernan Badillo
1470 Shore Drive
Bronx, New York 10465

RE: MUR 934(79)

Dear Mr. Benza:

On , 1980, the Commission found your counter-
offer of \$250.00 acceptable. Enclosed is the Commission's
proposed Conciliation Agreement for your consideration.
If you accept the terms of the Agreement, please sign and
mail it along with a check for Two Hundred-Fifty Dollars,
payable to the United States Treasury, within ten days of
your receipt of this letter.

Should you have any questions concerning this matter,
please feel free to contact Conley Edwards, Jr., at (202)
523-4060.

Sincerely,


Charles W. Steele
General Counsel

Enclosure:
Conciliation Agreement

30040204209

REPORT FOR FEDERAL ELECTION COMMISSION

In the Matter of)

Committee for the Re-Election) HUR 954 (79)
of Congressman Herman)
Badillo, et al.)

CONCILIATION AGREEMENT

30040290
This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that the Committee for the Re-Election of Congressman Herman Badillo ("Respondent") violated: 2 U.S.C. § 432(d) for failure to retain supporting documentation for expenditures; 2 U.S.C. § 434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; and 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

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

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

1. Respondent, Committee for the Re-Election of Congressman Herman Badillo, was the principal campaign committee of Herman Badillo in 1976.
2. Respondent in 1976 failed to retain supporting documentation for expenditures in violation of 2 U.S.C. § 432(d).
3. Respondent in 1976 failed to report payees for expenditure in excess of \$100.00 in violation of 2 U.S.C. § 434(b)(9) and (10).
4. Respondent in 1976 disbursed expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements in violation of 2 U.S.C. § 437b (a) and (b).

WHEREFORE, Respondent agrees:

1. That Respondent, Committee for the Re-Election of Congressman Herman Badillo, was the principal campaign committee of Herman Badillo in 1976.
2. That Respondent in 1976 did fail to retain supporting documentation for expenditures in violation of 2 U.S.C. § 432(d).

60040204291

3. That Respondent in 1976 did fail to report
payees for expenditures in excess of \$100.00
in violation of 2 U.S.C. § 434(b)(3) and (4).
4. That Respondent in 1976 did disburse expendi-
tures for non-petty cash purposes by means other
than through the use of a campaign depository
and by not maintaining a record of petty cash
disbursements in violation of 2 U.S.C. § 437b(a)
and (b).

VI. Respondent will pay a civil penalty to the Treasurer
of the United States in the amount of Two Hundred
and Fifty Dollars (\$250.00), pursuant to § 437g(a)
(6)(B).

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, et seq.

GENERAL CONDITIONS

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 re-
quirement thereof has been violated, it may institute
a civil action for relief in the United States
District Court for the District of Columbia.

30040304292

II. It is mutually agreed that 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. It is agreed that respondent shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

Date

Charles N. Steele
General Counsel
Federal Election Commission

Date

Louis C. Benza
Committee for the Re-Election
of Congressman Herman Badillo

80040204293

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Committee for the Re-election
of Herman Badillo, et al.

MUR 954

CERTIFICATION

I, Marjorie W. Emmons, Secretary to the Federal Election Commission, do hereby certify that on April 15, 1980, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 954:

1. Find the Committee for the Re-election of Congressman Herman Badillo's counter-offer of \$250.00 acceptable.
2. Send the letter and proposed Conciliation Agreement, as attached to the Memorandum to the Commission dated April 10, 1980.

Voting for this determination were Commissioners Aikens, Friedersdorf, Harris, McGarry, and Reiche.

Attest:

Date

4/15/80

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Received in Office of the Commission Secretary: 4-10-80, 4:52
Circulated on 48 hour vote basis: 4-11-80, 2:00

80040204294

ELECTION COMMISSION

NEW YORK, N.Y.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Louis C. Benza, Esquire
Committee for the Re-Election
of Congressman Herman Badillo
1470 Shore Drive
Bronx, New York 10465

RE: MUR 954(79)

Dear Mr. Benza:

On , 1980, the Commission found your counter-offer of \$250.00 acceptable. Enclosed is the Commission's proposed Conciliation Agreement for your consideration. If you accept the terms of the Agreement, please sign and mail it along with a check for Two Hundred-Fifty Dollars, payable to the United States Treasury, within ten days of your receipt of this letter.

Should you have any questions concerning this matter, please feel free to contact Conley Edwards, Jr., at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure:
Conciliation Agreement

80040304295

In the Matter of

Committee for the Re-Election
of Congressman Herman
Badillo, et al.

MEF 984 (79)

CONCILIATION AGREEMENT

30040204296
This matter having been initiated by the Federal Election Commission (hereinafter "the Commission"), pursuant to information ascertained in the normal course of carrying out its supervisory responsibilities, an investigation having been conducted after the Commission found reason to believe that the Committee for the Re-Election of Congressman Herman Badillo ("Respondent") violated: 2 U.S.C. § 432(d) for failure to retain supporting documentation for expenditures; 2 U.S.C. § 434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; and 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements.

NOW, THEREFORE, the Commission and Respondent, having duly participated in informal methods of conciliation, do hereby agree as follows:

- I. The Commission has jurisdiction over the Respondent and the subject matter of this proceeding, and this Agreement has the effect of a conciliation agreement under 2 U.S.C. § 437g(a)(4)(A).
- II. Respondent has had a reasonable opportunity to demonstrate that no action should be taken in this matter.

30040304297

16. Respondent agrees with the facts stated in the report with the Commission.

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

1. Respondent, Committee for the Re-Election of Congressman Herman Badillo, was the principal campaign committee of Herman Badillo in 1976.
2. Respondent in 1976 failed to retain supporting documentation for expenditures in violation of 2 U.S.C. § 432(d).
3. Respondent in 1976 failed to report payees for expenditure in excess of \$100.00 in violation of 2 U.S.C. § 434(b)(9) and (10).
4. Respondent in 1976 disbursed expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements in violation of 2 U.S.C. § 437b (a) and (b).

WHEREFORE, Respondent agrees:

1. That Respondent, Committee for the Re-Election of Congressman Herman Badillo, was the principal campaign committee of Herman Badillo in 1976.
2. That Respondent in 1976 did fail to retain supporting documentation for expenditures in violation of 2 U.S.C. § 432(d).

3. That Respondent in 1974 did fail to report
payees for expenditures in excess of \$100.00
in violation of 2 U.S.C. § 434(b)(2) and (3);
4. That Respondent in 1974 did disburse expendi-
tures for non-petty cash purposes by means other
than through the use of a campaign depository
and by not maintaining a record of petty cash
disbursements in violation of 2 U.S.C. § 437b(a)
and (b).

VI. Respondent will pay a civil penalty to the Treasurer
of the United States in the amount of Two Hundred
and Fifty Dollars (\$250.00), pursuant to § 437g(a)
(6)(B).

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, et seq.

GENERAL CONDITIONS

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 re-
quirement thereof has been violated, it may institute
a civil action for relief in the United States
District Court for the District of Columbia.

IX. It is mutually agreed that 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. It is agreed that respondent shall have not more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirement contained in this agreement and to so notify the Commission.

Date

Charles N. Steele
General Counsel
Federal Election Commission

Date

Louis C. Benza
Committee for the Re-Election
of Congressman Herman
Badillo

60040204299

In the Matter of
Commission for the Re-Election of
Congressman Herman Badillo,
et al.

MUR 954 (79)

CERTIFICATION

I, Marjorie W. Emms, Recording Secretary for the Federal
Election Commission's Executive Session on February 5, 1980, do
hereby certify that the Commission decided by a vote of 6-0 to
reject the recommendation contained in the General Counsel's
January 30, 1980 report on MUR 954 (79), and seek a civil penalty
of Five Hundred Dollars in this matter.

Attest:

2/8/80

Date

Marjorie W. Emms
Marjorie W. Emms
Secretary to the Commission

00040204300

MEMORANDUM TO: CHAIRMAN, BOARD

FROM: ROBERT W. BROWN, BOARD SECRETARY

DATE: FEBRUARY 1, 1980

SUBJECT: OBJECTION - MUR 954 - General Counsel's
Report dated 1-30-80, received in MUR
1-30-80, 12:25

The above-named document was circulated on
a 48 hour vote basis on 1-30-80, 4:00.

Commissioner Harris submitted an objection at
11:32, February 1, 1980, thereby placing MUR 954 on
the Executive Session Agenda for February 5, 1980.

80040304301

IN THE MATTER OF
COMMISSION FOR THE RE-ELECTION OF
CONGRESSMAN
BASILLO, JR.

COMMISSIONER'S REPORT

I. History of Case

This matter was initiated internally pursuant to audit findings resulting from the audit of the Committee for the Re-Election of Congressman Basillo ("the Committee"), the principal campaign committee of Herman Basillo and the Friends of Herman Basillo ("FOHB") a separate political committee established on behalf of Mr. Basillo's candidacy.

On June 20, 1979, the Commission found reason to believe that in 1976 the Committee violated: 2 U.S.C. §432(d) for failure to retain supporting documentation for expenditures, 2 U.S.C. §434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. §437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements; and 2 U.S.C. §441b by accepting a labor union contribution from the Pocketbook and Novelty Workers Union.

In addition, the Commission found reason to believe that the Friends of Warren, Inc. violated 2 U.S.C. § 441b by receiving and accepting contributions from various corporations, labor unions and national banks. Furthermore, the Commission found reason to believe that various corporations, labor unions and national banks violated 2 U.S.C. § 441b by making the illegal contribution.

II. Analysis

Cash Expenditures in Excess of \$100

2 U.S.C. § 432(d) requires all political committees to obtain and keep receipted bills, stating particulars, for all expenditures aggregating in excess of \$100.00 to the same person; 2 U.S.C. § 434(b)(9) and (10) requires that all reports filed with the Commission identify the person(s) to whom expenditures aggregating in excess of \$100 are made as well as the purpose of these expenditures, 2 U.S.C. § 437b(a) and 11 CFR § 103.3 require the all expenditures made by a committee on behalf of a candidate or to influence his election must be made by check drawn on a designated campaign depository unless such expenditures are in the sum of \$100 or less and is taken from a petty cash fund; and 2 U.S.C. § 437b(b) and 11 CFR § 102.10 provide that political committees may maintain petty cash funds from which

30040304

expenditures not in excess of \$100 can be made in connection with a single transaction or purchase. When keeping a petty cash fund, the Committee treasurer is required to maintain a written journal of all disbursements, including the particulars of each such payment.

An audit of the Committee revealed that the Committee issued sixty-seven (67) checks payable to cash totaling \$10,620.24 and maintained no formal petty cash system. Twenty-one (21) of the sixty-seven (67) checks payable to cash were for amounts in excess of \$100 ranging from \$110 to \$1,500. The checks written to cash in excess of \$100 totaled \$7,579.24. ^{1/}

Pursuant to this audit the Audit Division requested supporting documentation from the Committee indicating the ultimate payee of each cash expenditure (\$10,620.24), including those of less than \$100 in order that it could be determined which expenditures would require itemization. The Committee responded to their request by submitting 130 documents for cash expenditures totaling \$2,447.59, but, this documentation could not be traced to a particular cash expenditure because the dates and amounts shown on the documentation

^{1/}

All of these expenditures were itemized on amended reports with the payee disclosed as "cash".

60040305

did not correspond to the cash and money reported expenditures.

Although the Committee did report the amounts of each cash expenditure, ^{2/} each Committee failed to name the ultimate payee of the cash expenditures in question.

On or about October 25, 1979, the Office of General Counsel received a hand delivered letter from Louis C. Benza on behalf of the Committee. In this letter Mr. Benza stated that the Committee had found an additional \$2,085.99 in receipts and an October 6, 1976, Committee bank statement showing a re-depositing of \$1,850.00 of the monies previously withdrawn for the primary election day operating expenses. This communication continues by stating that recently discovered documentation taken together with the documentations previously submitted accounted for \$6,383.50 or 50% of the total \$10,620.24 in question and undocumented.

Mr. Benza concludes his letter by requesting a meeting with the Office of General Counsel to discuss the matter further. (Attachment I)

2/

These cash expenditures were reported as: "election day expenses", "food for volunteers", "office supplies", "postage", and etc.

On November 22, 1978, staff members of the Office of General Counsel and the Audit Division met with representatives of the Committee. The Committee representatives brought with them sixty-two (62) canceled checks that were made payable to cash and a diary-type ledger book giving the date and the purpose of each cash expenditure.

During the meeting the representatives explained that the campaign was a "nickel and dime" operation and that the majority of the workers were volunteers who believed in Hernan Badillo. According to the representatives the cash expenditures were made primarily to reimburse the campaign volunteers. It appears that checks were made to cash in order to obtain dimes for the workers to call in voter turn-out from pay telephones, car fare, meals, purchases from the local corner stores, etc.

Because the campaign was operated in this manner, the Committee maintains that it was very difficult to document every cash expenditure made in connection with this 1976 campaign.

In addition, the Office of General Counsel believes that the Committees have demonstrated best efforts in attempting to comply with the Commission's request for documentation of unsupported cash expenditures, particularly in view of the nature of the campaign.

80040204307

operation and the time involved here that the fact that the violations date back to 1974, the Office of General Counsel recommends that no further action should be taken regarding the cash expenditures in this matter.

2. Prohibited Campaign Contributions

300402043
The Committees received and accepted prohibited campaign contributions totaling \$3,050.00 from twelve labor unions, banking, and corporate entities; thirteen (13) of the fourteen (14) prohibited campaign contributions were in amounts of one hundred dollars (\$100) or more. The Committees have made every effort to comply with the Act by refunding all campaign contributions drawn on a prohibited bank account and the Commission has received documentation from either the committee or other respondents showing refunds to eleven (11) of the twelve (12) entities involved.

In light of the above, and consistent with prior Commission action the Office of General Counsel recommends no further action be taken as to these refunded 1976 and 1977 prohibited contributions.

As to Lipsig, Sullivan, Mollen & Liapakis, P.C., the respondent asserts that the contribution was not made from a corporate account. On November 5, 1979, this Office received a communication from the

...complaints that the ...
...from ...
...and ... Therefore, we recommend no further action
be taken as to the Lipsig, Sullivan, Moller & Liapakis,
P.C. violation of 2 U.S.C. § 441b.

RECOMMENDATIONS

1. Take no further action against the Committee for the Re-election of Congressman Herman Badillo.
2. Take no further action against the Friends of Herman Badillo.
3. Take no further action against the Pocketbook and Novelty Workers Union; Joint Council No. 16 International Brotherhood of Teamsters; the Washable Clothing, Sportswear and Novelty Workers Local 169 Almagamated Clothing Workers; United American Bank; Union Federal Savings and Loan Association of New York; Equitable Federal Savings and Loan Association of New York; Banco Popular de Puerto Rico; Castro Blanco, Piscioneri and Feder, P.C.; NAC Realty Company; IGC, P.C.; and Lipsig, Sullivan, Moller & Liapakis, P.C.
4. Close the file.
5. Send attached letters.

20 January 1980
Date


Charles W. Steele
General Counsel

Attachments

I, II, and III
Letters (12)

80040204309

Mr. Orley Edwards, Esq.
Federal Election Commission
Office of General Counsel
1125 K Street, N.W.
Washington, D.C. 20463

Re: Committee for the Re-election
of Congressman Eugene Sedillo

Dear Mr. Edwards:

The encaptioned committee has asked me to write to you concerning the notification to them by the F.E.C. in their letter of July 13, 1976.

As per our telephone conversation, I'm advising you of the following attempts by the committee to produce the back-up information requested in your communication.

Of the \$10,620.24 of cash expenditures originally declared not to be documented \$2,447.59 worth of receipts have been submitted. As of this date an additional \$2,085.99 have been found and will be submitted. I have enclosed a copy of the Oct. 6, 1976 bank statement of the committee which shows a re-deposit of \$1,850.00 on Oct. 5, 1976 of cash previously withdrawn and included in the \$10,620.24 for primary day operations. If this is accepted as documentation of cash expenditures, then \$6,383.50 or 60% of the commission's request has been complied with. In addition, there is some question as to the validity of debiting this committee with the cash disbursement of Sept. 27, 1976 in the amount of \$994.24.

79 OCT 29 4:04

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Attachment I

U.S. House of Representatives
Federal Election Commission

We would appreciate an opportunity to meet with you at your convenience to further document some of our oral arguments made on other cash disbursements. I also wish to advise you that all of the prohibited contributions made to Friends of Herman Badillo have been refunded. We will bring cancelled checks to you when we meet. I also hope that the P.C. contributions of the law firm of Scott Miller has been cleared up. In any event we would like to discuss this with you at our meeting. Please also be assured that we will continue to check for further documentation.

Sincerely,

Louis C. Benza

LOUIS C. BENZA
Committee for the Re-election
of Congressman Herman Badillo

Attachment I

[illegible]

Hon. Connelly Edwards
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20464

**Re: Contributions to the Campaign
of Herman Badillo**

Dear Mr. Edwards:

This is to confirm our prior telephone conversation of last week in connection with the above-referenced matter.

The contributions referred to in our prior communications are derived from non-repayable drawing accounts which are established for the partners to draw against their personal salary and their share of the profits.

For the purposes of illustration, if I had brought in a case which has been settled for \$45,000. and the firm earns a fee of \$15,000., under my agreement with the firm I would be entitled to a share equal to \$5,000. of the fee. This \$5,000. is at such point my personal money to dispose of as I see fit. Thus, if I make a campaign contribution of \$1,000. from the \$5,000. in such account, this \$1,000. contribution is not repayable to me by the firm but is considered as a personal expenditure.

It appears that In Volume 4, Issue 19, of the FEC record dated September 19, 1978, such contribution would be deemed an individual contribution as a "non-repayable" drawing account.

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Attachment II

as I have previously stated, the income
taxes which are derived by the Government
from the use of the property which have been collected by
the Government, which arise from utilization of the
property, these contributions will only be made on
individual cases. However, as is evident from the foregoing,
there was certainly no intent to circumvent pertinent rules and
I do not believe that there has been a violation of pertinent rules.

Again, your time and consideration are most sincerely
appreciated.

Very truly yours

SCOTT S. SPICER

SSS/mt

80040204313

Attachment II cont.



THE FEDERAL ELECTION COMMISSION RECORD

Volume 4, Number 9

September 1978

INFORMATION

Under this heading, the Record periodically summarizes new developments of general interest to candidates for Federal office and committees which support such candidates.

TREATMENT OF PROHIBITED CONTRIBUTIONS

The Commission recently approved a Notice to all candidates and committees regarding its policy on the making and acceptance of corporate and labor organization contributions. In the course of carrying out its supervisory responsibilities, the Commission has noted many instances of candidates and/or committees accepting these contributions. Under the Act, corporations and labor organizations are prohibited from making contributions (or expenditures) in connection with Federal elections. Candidates and committees are prohibited from accepting or receiving such contributions.

In the past, the Commission has usually regarded the refunding of a prohibited contribution within a reasonable time as voluntary compliance with the Act. In such instances, no enforcement action, such as a civil penalty, was taken against the contributor or the recipient. During this election year and in the future, however, the Commission will not only require that the illegal corporate or labor organization contribution be refunded but, in appropriate circumstances, will also assess a civil penalty against the contributor and/or the recipient.

Candidates and committees are urged to be especially careful in accepting contributions from possible illegal sources. The regulations set out a procedure for handling such contributions (11 CFR 103.3(b)). (For a discussion of this

procedure, see the Record, April 1978, p. 5.) Candidates and committees should review this procedure and exercise "close scrutiny and careful investigation of any suspect contribution."

To assist candidates and committees in complying with this provision of the Act, the Notice clarifies the difference between three types of corporate accounts used by employees:

1. **Repayable Drawing Accounts.** Contributions from an account on which an employee may draw, but must later repay, are considered corporate contributions for the period that the draw is outstanding. Therefore, such contributions are prohibited.
2. **Nonrepayable Drawing Accounts.** Contributions from a nonrepayable drawing account, established to permit an employee to draw against his/her salary, profits or commissions, are considered personal contributions of the employee. Such contributions are lawful and are subject to the individual contribution limitations.
3. **Expense Accounts.** Contributions from expense accounts funded by a corporation are prohibited.

EXTENDED OFFICE HOURS

Between September 5, 1978, and the General Election, November 7, 1978, the Commission's Office of Public Communications will maintain extended office hours to accommodate calls from candidates and committees in Western time zones. Information Specialists will be available between 9:00 a.m. and 7:30 p.m., Eastern time. During these hours, candidates and committees may call toll-free, 800/424-9630, for information about the Act and regulations. Copies of reporting forms and publications may also be ordered.

Attachment III

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Scott E. Mollen, Esquire
Lipsig, Sullivan, Mollen & Wiedeman, P.C.
100 Church Street
New York, New York 10007

Re: MUR 354(79)

Dear Mr. Mollen:

This is to confirm our receipt of your letter dated October 31, 1979, in connection with the Commission's investigation in the captioned matter. After considering the information you provided the Commission determined, on January 1980, that there was no reasonable cause to believe that your corporation violated 2 U.S.C. § 441b. Accordingly the Commission has closed its file on this matter.

Should you have any questions, please contact Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

30040304315

60040204316

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Stanley N. Berman, David
Cohen, Weiss and Simon
Attorneys at Law
605 Third Avenue
New York, New York 10016

Re: MUR 954(79)

Dear Mr. Berman:

The Commission voted to terminate its investigation in MUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

Joseph Trerotola
Joint Council 16

FEDERAL BUREAU OF INVESTIGATION
U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20535

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

George N. Kirschenbaum,
Assistant General Counsel
Washable Clothing, Sportswear
and Novelty Workers Union
33 West 14th Street
New York, New York 10011

Re: MUR 954(79)

Dear Mr. Kirschenbaum:

The Commission voted to terminate its investigation in MUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040204317

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Michael P. Youdouin, Esquire
Vincent & Schickler
Counselor At Law
225 Broadway
New York, New York 10007

Re: MUR 954(79)

Dear Mr. Youdouin:

The Commission voted to terminate its investigation in MUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040204318

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

James S. Anchin
Certified Public Accountants
270 Madison Avenue
New York, New York 10016

Re: MUR 954(79)

Dear Mr. Anchin:

The Commission voted to terminate its investigation in MUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040304319



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Theodore P. Cohen
Vice President and General Counsel
Banco Popular De Puerto Rico
Banco Popular Building
7 West 51st Street
New York, New York 10019

Re: MUR 954(79)

Dear Mr. Cohen:

The Commission voted to terminate its investigation in MUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040204320

80040204321
CERTIFIED MAIL
RETURN RECEIPT REQUESTED

F. J. Spadafora
Vice President & Controller
United American Bank
50 Broadway
New York, New York 10004

Re: MUR 954(79)

Dear Mr. Spadafora:

The Commission voted to terminate its investigation in MUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

80040304322

CHARLES N. STEELE
GENERAL COUNSEL

Irwin S. Cantor, President
ISC, P.C.
919 Third Avenue
New York, New York 10022

Re: HUR 954(79)

Dear Mr. Cantor:

The Commission voted to terminate its investigation in HUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

60040204323

Sol Bogan, Esquire
Attorney At Law
One Penn Plaza
New York, New York 10021

Re: NUR 954(79)

Dear Mr. Bogan:

The Commission voted to terminate its investigation in NUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

Nathan Katz
Pocket book and Novelty
Workers Union

FEDERAL BUREAU OF INVESTIGATION
WASHINGTON, D.C. 20535

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Vite, President
Union Federal Savings and
Loan Association
200 East 23rd Street
New York, New York 10010

Re: MUR 954(79)

Dear Mr. Vite:

The Commission voted to terminate its investigation in MUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

30040204324

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Jack Schwartz
Senior Vice President
Equitable Federal Savings
and Loan Association
356 Fulton Street at Borough Hall
Brooklyn, New York 11201

Re: MUR 954(79)

Dear Mr. Schwartz:

The Commission voted to terminate its investigation in MUR 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

The Commission reminds you, however, that any campaign contributions to any Federal candidate from a corporate entity is a violation of 2 U.S.C. § 441b and steps should be taken to ensure that no future violations occur.

If you have any questions, please direct them to Conley Edwards, Jr. at (202)523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure: Commission's Certification

cc: Louis A. Benza
Committee for the Re-election
of Congressman Herman Badillo

00040204325

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. Louis A. Benza
Committee for the Re-Election of
Congressman Herman Badillo
1470 Shore Drive
Bronx, New York 10465

Re: MUA 954(79)

Dear Mr. Benza:

On January 1, 1980, the Commission voted to terminate its investigation in MUA 954(79). A copy of the Commission's determination is enclosed for your information. Accordingly, the Commission intends to close its files in this matter.

However, the Commission reminds you that supporting documentation for expenditures and proper reporting of contributions and expenditures is essential for adhering to the provisions of the Federal Election Campaign Act. Furthermore, it is illegal to accept contributions from corporations, banks and labor organizations, therefore steps must be taken to insure that such prohibited contributions not be accepted in future campaigns.

If you have any questions, please direct them to Conley Edwards, Jr. at (202) 523-4060.

Sincerely,

Charles N. Steele
General Counsel

Enclosure

Commission's Certification

cc: Dr. Pedro L. Rodriguez

80040204326

FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwc*
FROM: MARJORIE W. EMMONS, MARGARET CHANEY *me*
DATE: JANUARY 8, 1980
SUBJECT: MDR 954 - Interim Investigative
Report dated 1-7-80; Received in
OCS 1-7-80, 10:55

The above-named document was circulated to the Commission on a 24-hour no-objection basis at 4:00, January 7, 1980.

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

80040304337

In the Matter of

Committee for the Re-Election
of Congressman Herman Badillo,
et al.

80 JAN
NUM 754

INTERIM INVESTIGATIVE REPORT

30040004339

On June 30, 1979, the Commission found reason to believe that the Committee for the Re-election of Congressman Herman Badillo violated: 2 U.S.C. § 432(d) for failure to retain supporting documentation for expenditures; 2 U.S.C. § 434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements; and 2 U.S.C. § 441b by accepting labor union contributions. Additionally, the Commission found reason to believe that Friends of Herman Badillo accepted eleven contributions from prohibited sources in violation of 2 U.S.C. § 441b, and found reason to believe that the contributing entities also violated 2 U.S.C. § 441b.

The Office of General Counsel has received satisfactory responses from all the respondents in this matter. Also, on November 14, 1979, Commission staff members met with representatives of the Committees to further discuss the matter. We have now assembled the information provided by the Committees and the other respondents and have completed our analysis. A recommen-

80040204330

30040304331

Re: Joint Council No. 16, International Brotherhood of Teamsters
7-14-54

This will confirm that Joint Council No. 16 has obtained refund of the \$200 which was the subject of the General Counsel's letter of August 27. I enclose for your records copies of:

1. My letter of October 12 to the Committee to reelect Congressman Badillo, c/o Pedro L. Rodriguez;
2. Mr. Rodriguez's letter to the Joint Council dated October 17 and postmarked November 14; and
3. The Committee's check which was enclosed with Mr. Rodriguez's letter.

This will also confirm that any violation which may have occurred was inadvertent. The Joint Council's contribution was by check made payable to Martin Fife as representative for a dinner committee described as honoring Mr. Badillo. The Joint Council was not aware that any proceeds would be used in connection with a Federal election and did not intend that its contribution be used for such purpose. It will take all

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

80040304332

Very truly yours,
For the Board of Directors
James M. Boardman

Very truly yours,
Stanley M. Boardman
Stanley M. Boardman

COTTON BOND

Joint Council 16
Att. Joseph Boardman

COTTON FIBER USA

80040204333

October 12, 1979

Committee to Reelect Congressman
Herman Badillo
c/o Pedro L. Rodriguez, D.D.S.
1414 Metropolitan Avenue
Bronx, New York

Re: Joint Council No. 16, International
Brotherhood of Teamsters

Gentlemen:

I am writing on behalf of our client Joint Council No. 16, International Brotherhood of Teamsters. I understand that the Joint Council issued a check in the sum of \$200 on February 16, 1977, payable to Martin Fife, Secretary, and marked for deposit only to Friends of Herman Badillo.

Upon the advice of the Federal Election Commission, I request immediate refund to the Joint Council. Please forward to me your check made payable to Joint Council No. 16, International Brotherhood of Teamsters.

Thank you in advance for your cooperation.

Very truly yours,

Stanley M. Berman

SMB/dd

cc: Federal Election Commission
Att: Conley Edwards, Esq.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

bec: Joe Perotola

COMMITTEE

October 17, 1979

Joint Council #16, INC
265 West 14th Street
New York, New York 10011

TO WHOM IT MAY CONCERN:

As per FEC regulations we are herewith returning the contribution you made to Martin Fife, Treasurer, for the Dinner honoring Congressman Herman Badillo, held at the Essex House in New York City on March 18th, 1977.

Thank you for your attention to this matter and I regret any inconvenience this may cause you.

Very truly yours,

Pedro L. Rodriguez
Pedro L. Rodriguez
Treasurer

00040204334

COMMITTEE FOR THE RE-ELECTION OF
CONGRESSMAN HERMAN BADILLO
c/o Dr. Pedro L. Rodriguez
1414 Metropolitan Avenue
Bronx, New York 10462

TOTAL OF CHECKS	
DATE	
AMOUNT	
TOTAL DEBIT	
TOTAL CREDIT	
DATE OF CHECK	

NUMBER

October 17, 1979 $\frac{1.109}{210}$

PAY TO THE ORDER OF Joint Council #16, IAT \$200⁰⁰/₁₀₀ —

Two Hundred & 00/100 ————— DOLLARS



BANKERS TRUST COMPANY
70 EAST 101ST STREET
BRONX, N. Y. 10481

COMMITTEE FOR THE RE-ELECTION
OF CONGRESSMAN HERMAN BADILLO

31

Herman J. Nieto

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COHEN, WEISS AND SIMON
605 THIRD AVENUE
NEW YORK, N. Y. 10016



Conley Edwards, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

...I have previously stated
...the interest in
...has been
...which arise from criticism
...contributions will only be
...as is evident from the fact that
...to circumvent parties
I do not believe that there has been a violation of political rules.

Again, your time and consideration are most sincerely
appreciated.

Very truly yours

SCOTT E. MOORE

SEN/mt

80040204330

11
1075 Third Avenue
New York, New York 10022
October 25, 1979

Mr. Conley Edwards, Esq.
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

MUR 9EM

Re: Committee for the Re-election
of Congressman Brown Padillo

Dear Mr. Edwards:

The captioned committee has asked me to write to you concerning the notification to them by the F.E.C. in their letter of July 13, 1979.

As per our telephone conversation, I am advising you of the following attempts by the committee to produce the back-up information requested in your communication.

Of the \$10,620.24 of cash expenditures originally declared not to be documented \$2,447.59 worth of receipts have been submitted. As of this date an additional \$2,095.99 have been found and will be submitted. I have enclosed a copy of the Oct. 6, 1976 bank statement of the committee which shows a re-deposit of \$1,850.00 on Oct. 5, 1976 of cash previously withdrawn and included in the \$10,620.24 for primary day operations. If this is accepted as documentation of cash expenditures, then \$6,383.50 or 60% of the commission's request has been complied with. In addition, there is some question as to the validity of debiting this committee with the cash disbursement of Sept. 27, 1976 in the amount of \$994.24.

79 OCT 29 P 4: 04

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

30040204339

Mr. Charles E. Schuler, Jr.
Federal Election Commission

We would appreciate an opportunity to meet with you at your convenience to further document some of our oral arguments made on other cash disbursements. I also wish to advise you that all of the prohibited contributions made to Friends of Herman Badillo have been refunded. We will bring cancelled checks to you when we meet. I also hope that the P.C. contributions of the law firm of Scott Muller has been cleared up. In any event we would like to discuss this with you at our meeting. Please also be assured that we will continue to check for further documentation.

Sincerely,

Louis C. Benza

LOUIS C. BENZA
Committee for the Re-election
of Congressman Herman Badillo

80040204340

1470 Stone Drive
Rumson, New York 10463
October 23, 1979

Mr. Conley Edwards, Esq.
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

Re: Committee for the Re-election
of Congressman Thomas Budilko

Dear Mr. Edwards:

The captioned committee has asked me to write to you concerning the notification to them by the F.E.C. in their letter of July 13, 1979.

As per our telephone conversation, I am advising you of the following attempts by the committee to produce the back-up information requested in your communication.

Of the \$10,620.24 of cash expenditures originally declared not to be documented \$2,447.59 worth of receipts have been submitted. As of this date an additional \$2,085.99 have been found and will be submitted. I have enclosed a copy of the Oct. 6, 1976 bank statement of the committee which shows a re-deposit of \$1,850.00 on Oct. 5, 1976 of cash previously withdrawn and included in the \$10,620.24 for primary day operations. If this is accepted as documentation of cash expenditures, then \$6,383.50 or 60% of the commission's request has been complied with. In addition, there is some question as to the validity of debiting this committee with the cash disbursement of Sept. 27, 1976 in the amount of \$994.24.

19 OCT 25 P 3:42

RECEIVED
GENERAL COUNSEL

Mr. Conley Edward
Federal Election Commission

-2-

10/25/79

We would appreciate an opportunity to meet with you at your convenience to further document some of our oral arguments made on other cash disbursements. I also wish to advise you that all of the prohibited contributions made to Friends of Herman Badillo have been refunded. We will bring cancelled checks to you when we meet. I also hope that the P.C. contributions of the law firm of Scott Miller has been cleared up. In any event we would like to discuss this with you at our meeting. Please also be assured that we will continue to check for further documentation.

Sincerely,

Louis C. Benza

LOUIS C. BENZA
Committee for the Re-election
of Congressman Herman Badillo

00040004342

JAMES L. HANCOCK
RICHARD L. HANCOCK
RICHARD L. HANCOCK
RICHARD L. HANCOCK
JAN P. LEE-WALKER
JAN P. LEE-WALKER
RICHARD L. HANCOCK
PETER BERMAN

October 12, 1979

Committee to Elect Congressmen
Herman Badillo
c/o Pedro L. Rodriguez, D.D.S.
1414 Metropolitan Avenue
Bronx, New York

Re: Joint Council No. 16, International
Brotherhood of Teamsters

Gentlemen:

I am writing on behalf of our client Joint Council No. 16, International Brotherhood of Teamsters. I understand that the Joint Council issued a check in the sum of \$200 on February 16, 1977, payable to Martin Pife, Secretary, and marked for deposit only to Friends of Herman Badillo.

Upon the advice of the Federal Election Commission, I request immediate refund to the Joint Council. Please forward to me your check made payable to Joint Council No. 16, International Brotherhood of Teamsters.

Thank you in advance for your cooperation.

Very truly yours,

Stanley M. Berman
Stanley M. Berman

SMB/dd

cc: Federal Election Commission
Att: Conley Edwards, Esq.

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

GENERAL COUNSEL
OFFICE OF THE
RECORDS

8 0 0 1 0 0 0
Mr. Louis C. Benza
Committee for the Re-election
of Congressman Herman Badillo
1470 Shore Drive
Bronx, New York 10465



Mr. Conley Edwards, Esq.
Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, D.C. 20463

SLM/mt

LIPSTG. SULLIVAN, MOLLEN & LIAPAKIS, P. C.

100 CHURCH STREET - NEW YORK, N. Y. 10007

Hon. Connelly Edwards
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20464

3004020434
MEMORANDUM TO: CHIEF OF STAFF
FROM: MARJORIE H. ENGLISH/ADMINISTRATIVE SERVICES
DATE: OCTOBER 19, 1979
SUBJECT: MUR 534 - Interim Investigative Report
dated 10-17-79; Received in OCS
10-18-79, 10:43

The above-named document was circulated to
the Commission on a 24-hour no-objection basis
at 4:00, October 18, 1979.

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

Furthermore, the Commission found reason to believe that the Pocketbook and Novelty Workers Union violated 2 U.S.C. § 441b by contributing to the Committee for the Re-election of Congressman Herman Badillo.

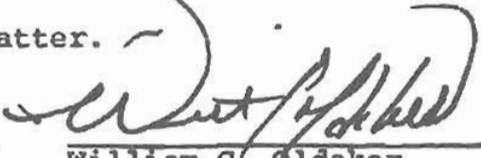
Finally, the Commission found reason to believe that the Pocketbook and Novelty Workers Union; Joint Council No. 16 International Brotherhood of Teamsters; the Washable Clothing, Sportswear and Novelty Workers Local 169 Amalgamated Clothing Workers; United American Bank; Union Federal Savings and Loan Association of New York; Equitable Federal Savings and Loan Association of New York; Banco Popular de Puerto Rico; Castro Blanco, Piscioneri and Feder, P.C.; NAC Realty Company; IGC, P.C.; and Lipsig, Sullivan, Mollen and Liapakis, P.C. violated 2 U.S.C. § 441b by contributing to the Friends of Herman Badillo.

The Office of General Counsel still has not received adequate responses from one labor and one corporate respondent. It appears that these two respondents, the Joint Council No. 16 International Brotherhood of Teamsters and Lipsig, Sullivan and Liapakis, P.C., have not received a refund of their contributions from the Committee nor have they provided an adequate explanation of why the contributions were remitted through a corporate or labor bank account.

If the aforementioned respondents have not responded by October 26, 1979, this Office will make further recommendations as to the disposition of this matter.

Date

10/17/79


William C. Oldaker
General Counsel

October 3, 1979

William C. Oldaker, Esq.,
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Re: Joint Council No. 16, Inter-
national Brotherhood of Teamsters
MUR 954

Dear Mr. Oldaker:

I am writing in reference to your letter of August 27 to our client Joint Council No. 16 and to reconfirm our desire to cooperate in the investigation and speedy disposition of this matter.

I had preliminary discussions with Clare Lindsay of your office on September 19 and understood that prompt arrangements could be made to resolve the issues and close the file. Apparently, Ms. Lindsay left the Commission shortly after our conversation, and I was advised on September 21 by Clara Kircher and Anne Weissenborn that I would be contacted when the case was reassigned.

Please have the staff member who is now assigned to this matter contact me.

Very truly yours,

Stanley M. Berman

SMB/dd

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

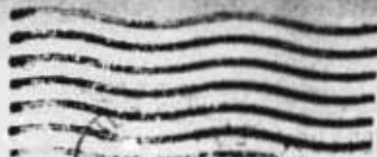
COHEN, WEISS AND SIMON
605 THIRD AVENUE
NEW YORK, N. Y. 10016



Conley Edwards, Esq.
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

800430432

COHEN, WEISS AND SIMON
605 THIRD AVENUE
NEW YORK, N. Y. 10016



90 : 01 11 01 100 62.

RECEIVED
FEDERAL ELECTION
COMMISSION

William C. Oldaker, Esq.
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/MARGARET CHANEY
DATE: SEPTEMBER 6, 1979
SUBJECT: MUR 954 - Interim Investigative
Report dated 9-4-79; Received
in OCS 9-5-79, 9:56

The above-named document was circulated to
the Commission on a 24-hour no-objection basis
at 4:00, September 5, 1979.

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

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UNITED STATES FEDERAL ELECTION COMMISSION

In the Matter of)
)
Committee for the Re-Election)
of Congressman Herman Badillo.)
et al.)

NEW 534

Interim Investigative Report

On June 20, 1979, the Commission found reason to believe that the Committee for the Re-Election of Congressman Herman Badillo violated: 2 U.S.C. § 432(d) for failure to retain supporting documentation for expenditures; 2 U.S.C. § 434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements; and 2 U.S.C. § 441b by accepting labor union contributions from the Pocketbook and Novelty Workers Union.

The Commission also found reason to believe that the Friends of Herman Badillo violated 2 U.S.C. § 441b by accepting contributions from the Pocketbook and Novelty Workers Union, Joint Council No. 16 International Brotherhood of Teamsters, and the Washable Clothing, Sportswear and Novelty Workers Local 169 Almalgamated Clothing Workers, United American Bank, Union Federal Savings and Loan

30040204396
Association of New York, Equitable Federal Savings and
Loan Association of New York, Banco Popular de Puerto
Rico, Castro-Blanco, Piscioneri and Feder, P.C., NAC
Realty Company, IGC, P.C., and Lipsig, Sullivan, Mollen
and Liapakis, P.C. and the El Barrio Chamber of Commerce.

Furthermore, the Commission found reason to believe
that the Pocketbook and Novelty Workers Union violated 2
D.S.C. § 441b by contributing to the Committee for the
Re-Election of Congressman Herman Badillo.

Finally, the Commission found reason to believe
that the Pocketbook and Novelty Workers Union; Joint
Council No. 16 International Brotherhood of Teamsters;
the Washable Clothing, Sportswear and Novelty Workers
Local 169 Alamagamated Clothing Workers; United American
Bank; Union Federal Savings and Loan Association of New
York; Equitable Federal Savings and Loan Association of
New York; Banco Popular de Puerto Rico; Castro Blanco,
Piscioneri and Feder, P.C.; NAC Realty Company; IGC,
P.C.; and Lipsig, Sullivan, Mollen and Liapakis, P.C.
violated 2 U.S.C. § 441b by contributing to the Friends
of Herman Badillo.

The Office of General Counsel has received responses
from all but two of the twelve respondents. It appears
from the responses that all but one of the contributions
in question were made for a fundraising dinner for Mr.

Badillo held in March of 1977. At this time, Herman Badillo was running for the Mayor of the City of New York. The respondents admit they were not aware that the proceeds of their ticket purchases would be used to help defray Mr. Badillo's congressional campaign debt as well as to fund his mayoral campaign.

However, even though these two purposes were not stated on the fundraiser ticket itself, the accompanying contribution cards contained the statement that the Friends of Herman Badillo Committee reports were filed with the Federal Election Commission. Moreover, several corporate contributions received at the dinner were earmarked specifically for Badillo's mayoral related polling expenses, indicating that at least some of the contributors at the dinner were aware that the fundraiser had a dual purpose. These earmarked contributions were deposited in a separate account.

In any event, the Committee for the Re-Election of Congressman Herman Badillo has refunded ten of thirteen contributions in question. Two of the remaining contributions are disclosed as outstanding debts on a recently filed report of receipts and expenditures. The final contribution apparently represents personal funds, although this Office is still awaiting a letter from the contributor providing a detailed explanation of the nature of the contribution.

The Treasurer of the Committee for the Re-Election of Congressman Herman Badillo has replied at length explaining why so many cash expenditures were made and why little docu-

July 18, 1979

Ms. Chela Lindsay
1414 Metropolitan Avenue
Bronx, New York 10462

RE: NUM 954

Dear Ms. Lindsay:

Pursuant to our telephone discussions, I am advising you that the company's check was a mistake made by my secretary. I am immediately reimbursing the Association for the \$100.00.

She did not realize that the dinner held for the Honorable Herman Badillo on March 18, 1977, at the Essex House was a fund raising affair. Her understanding was that it was a dinner expense.

Please accept my apology in this matter.

Very truly yours,

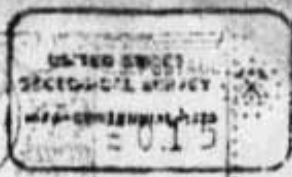

C. Fife

cc: Martin D. Fife
180 Madison Avenue
New York, New York 10016

Union Federal Savings

AND LOAN ASSOCIATION OF NY

200 East 23rd Street
New York, NY 10010



Ms. Clair Lindsay
1325 K Street, N. W.
Washington, D. C. 20463

79 AUG 31 AM 11:59

RECEIVED
FEDERAL ELECTION
COMMISSION

August 24, 1979

Clare Lindsay, Esq.
Federal Election Commission
1125 K Street N.W.
Washington, D.C. 20463

Re: Pocketbook and Novelty Workers
Union, Local 1, AFL-CIO
-and-
"Friends of Herman Badillo"
NUR 954
William C. Oldaker, Esq.
Letter July 3, 1979

Dear Ms. Lindsay:

This is to confirm our telephone conversation of Tuesday, afternoon, July 25, 1979.

As attorney for Local 1 (now "Leather Goods, Plastics, Handbags & Novelty Workers Union, Local 1, AFL-CIO"), I advise you that (a) the Union wished to cooperate fully with the Commission and your office in regard to the subject matter, and that, accordingly, whatever documents, material, information, etc., that you might require of the Union would be submitted forthwith.

In response to the letter of July 3, 1979, by general counsel, William C. Oldaker, Esq., I informed you that at no time did the Union officials understand or intend that the purchase of two (2) tickets for a total of \$200. to attend a dinner honoring Congressman Herman Badillo on March 18, 1977, represented a contribution to a campaign account or fund for a federal election. Photocopies of the Dinner Invitation and the Union's payment check (including reverse side) are enclosed for your file.

You should note that the check was drawn on the Union's "Community Fund", which is a separate and segregated account, apart from its general funds, for social, community and philanthropic activities. It was made payable to "Martin Fife, Chairman", (although subsequently endorsed "Deposit Only, Friends of Herman Badillo, Martin Fife") who was believed to be the Dinner Chairman.

Additionally, the Invitation makes no reference to any

Clara Linhart, Mrs.

August 31, 1972

committee, campaign, election or organization which would indicate or suggest, even remotely, the applicability or considerations of the provisions of 2 U.S.C. §441b.

On or about July 27, 1972, the Union received a refund of its \$200.

Based upon all of the foregoing, I urged that no further action be taken by the Commission in connection with local 1.

If you should require any further information or material for your investigation, please contact me accordingly.

Very truly yours,

Sol Bogen

SB:ja
(w/ encl.)

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60040204363

80040204364

8 0 0 4 0 2 0 4 3 6 5

2021

1290
3377

to attend a dinner

honoring

Congressman Herman

The House

100 Central Park South

Friday evening, March 10th, 1977

Guest Speaker:

Hon. Henry S. Reuss

Chairman, House Building, Planning
and Urban Affairs Committee

Reception - 7:00 pm

Dinner - 8:00 pm

60040204366
SOL BOGEN

ONE PENN PLAZA
NEW YORK, N. Y. 10001



Eisenstein
USA 15c

Clare Lindsay, Esq.
Federal Election Commission
1325 K Street N.W.
Washington, D.C. 20463

August 6, 1979

Federal Election Commission
1300 K Street N.W.
Washington, D. C.

Re: Castro-Blanco, Piscioneri & Feder,
Architects, P.C.
F.E.C. Ref.: MUR 954

Gentlemen:

This letter is a follow-up of this firm's
letter to the Commission dated July 24, 1979, in reference
to the above matter.

The contribution to the Hon. Herman Badillo
which was made by Castro-Blanco, Piscioneri & Feder,
Architects, P.C.. (CPF), has been returned to CPF.
Enclosed herewith are photocopies of the face of the check
with which the contribution was returned, the back of the
check containing CPF's endorsement "for deposit only" and
a cover letter which accompanied the check from an entity
named "Committee for the Re-election of Congressman Herman
Badillo".

We would appreciate your advising this firm of
the Commission's disposition of this matter.

Respectfully submitted,

VINCENTI & SCHICKLER

Michael F. Youdovin

Michael F. Youdovin

MFY:nf

Encls.

79 AUG 15 P 2:27

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

80040304368

As per FEC regulations we are herewith returning the contribution you made to Martin Fife, Treasurer, for the Dinner honoring Congressman Herman Badillo, held at the Essex House in New York City on March 18th, 1977.

Very truly yours,

RECEIVED

CASTRO - BLANCO
PISCIONERI & FEDER

[illegible]

04399

NUMBER

TOTAL OF INVOICES
LESS % DISCOUNT
TOTAL DEDUCTIONS
AMOUNT OF CHECK

PAY TO THE ORDER OF

July 20, 1979
Castro-Blanco, Licio
Three Hundred & 100/100
P.C.
8300 100
DOLLARS



BANKERS TRUST COMPANY
70 EAST 161ST STREET
BRONX, N. Y. 10451

31

COMMITTEE FOR THE RE-ELECTION
OF CONGRESSMAN HERMAN BADILLO

Gerard J. Nieto

⑆0210⑉0103⑆ 031⑉42006195⑆

80040204370

For deposit only:

Castro-Blanco, Piscoener & Feder,
Architects, P.C.

00040204371

VINCENTI & SCHICKLER
225 BROADWAY
NEW YORK, N.Y. 10007



N.Y. 10007



79 AUG 15 PM 12:44

RECEIVED
FEDERAL ELECTION
COMMISSION

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

BANCO POPULAR
7 WEST 57 STREET
NEW YORK, N.Y. 10019

August 6, 1979

10832
500
351-1288
BANCO POPULAR

Ms. Claire Lindsey
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

MUR 954

Dear Ms. Lindsey:

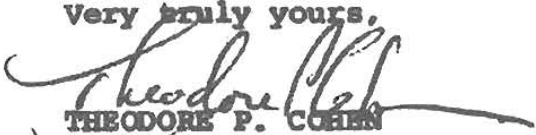
In reply to your letter of July 3, 1979, to Ramon Feliciano of our bank and in furtherance of my telephone conversation with you of July 26, 1979, please allow this letter to formally answer the inquiry you have made of the bank.

The \$200 contribution to "Martin Fife - Chairman" made on March 17, 1977, was issued by the bank in payment of a charge for a dinner for two in honor of Herman Badillo given at the Essex House on March 18, 1979. When payment was made, it was not known by the bank that any of the funds were to be used in furtherance of Mr. Badillo's running for Federal office. It was thought that the dinner was for other purposes, and the bank felt the charge was for the cost of the dinner and evening. It should be noted that the \$200 was returned to the bank on or about July 25, 1979.

It is not felt that the bank committed any violation of the Federal statutes. It should be noted that our bank is not a national bank but a bank organized and existing under the laws of the Commonwealth of Puerto Rico, duly licensed to do banking business in the State of New York.

I trust that with this letter you will be closing your investigation in this matter. However, if you wish to go further or if you desire any further information or material, please do not hesitate to contact the undersigned.

Very truly yours,


THEODORE P. COHEN

Vice President and
General Counsel, New York

TPC:DS

Banco Popular
de Puerto Rico



Ms. Claire Lindsey

Federal Election Commission

1325 K Street, N.W.

Washington, D. C. 20463

79 AUG 9 AM 8:59

NOI
COMMISSION
FEDERAL ELECTION

7 West 51st St., New York, N. Y. 10019



15 UNION SQUARE • NEW YORK, N.Y. 10003
(212) 255-7800 • 777-3800

Temporary Office
770 Broadway, New York, New York 10003

July 31, 1979

Clare Lindsay, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

Re: Local 169, Amalgamated Clothing and
Textile Workers Union, AFL-CIO
MUR 954

Dear Ms. Lindsay:

This letter will confirm our telephone conversation of yesterday. During that conversation, I informed you that Local 169, Amalgamated Clothing and Textile Workers Union, has received a check in the amount of \$200.00 from the Committee for the Re-Election of Congressman Herman Badillo. This check was apparently sent to refund what the Commission claims to have been a contribution in violation of 2 USC 441(b). I have enclosed a copy of the check as well as the covering letter sent with it.

It is my understanding that as a result of the refund this matter may now be closed. If this assumption is incorrect, please advise me as to what else must be done by the Union.

Very truly yours,

George A. Kirschenbaum
Assistant General Counsel

GAK/ss

cc: Kilmer Caban
Sydney Bykofsky

VICE PRESIDENTS

SAMUEL J. AZZINARO
OMA BARTON
DENIS A. BLAIS
DAVID CHANEY
ABRAHAM CHATMAN
CHARLES "BUD" CLARK
DOROTHY CONGOS
JOSEPH COPONI

JEAN-MARC COUTURE
FRANK CUCCIO
EMMA DAMERON
WAYNE DERNONCOURT
WILLIAM ROGER DOVE
HENRY DROPKIN
BRUCE DUNTON
CHARLES S. ENGLISH
GEORGE FECTEAU
SAM FOX

CARL E. FRAZIER
CHARLES J. GARRAHAN
SANDER GENIS
ANGELO G. GEORGIAN
HARRY GOLDSMITH
MURRAY GOLDSTEIN
WILLIAM C. HALL
DAVID T. HARRIS
BILL HIMES
SCOTT HOYMAN

HARRY LAUTMAN
LEONARD LEVY
RICHARD MacFADYEN
MICHAEL J. MEROLA
JOYCE D. MILLER
VERA MILLER
MURRAY MORENO
FRANK NICHOLAS JR.
SAM NOCELLA
DIANA NUNES

VINCENT RICCIARDELLI
CHARLES SALLEE
LOUIS SIMON
LEON SPITZER
PAUL SWAITY
PETER J. SWOBODA
CECIL TOPPIN

Office of the President
Washable Clothing Sportswear &
Novelty Workers Union, Local 169
33 West 14th Street
New York, N.Y. 10011
TO WHOM IT MAY CONCERN:

As per FEC regulations we are herewith returning the contribution you
made to Martin Fife, Treasurer, for the Dinner honoring Congressman
Herman Badillo, held at the Essex House in New York City on March
18th, 1977.

Thank you for your attention to this matter and I regret any
inconvenience this may cause you.

Very truly yours,

Pedro L. Rodriguez
Pedro L. Rodriguez
Treasurer

00040
AMALGAMATED CLOTHING AND TEXTILE WORKERS UNION

ACWU

AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003

Clare Lindsay, Esq.
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463



28 AUG 6 PM 1:32

RECEIVED
FEDERAL ELECTION
COMMISSION

THE OFFICE OF IRWIN G. CANTOR
918 THIRD AVENUE • NEW YORK, N.Y. 10022

July 31, 1979

Federal Elections Committee
1325 K Street N.W.
Washington, D.C. 20463

Attention: Miss Claire Lindsay

Dear Miss Lindsay:

In accordance with our conversation of July 30, 1979 I enclose a copy of letter to The Office of Irwin G. Cantor from Committee for the Re-election of Congressman Herman Bedillo dated July 20, 1979 together with copy of check in the sum of \$100.00 returned to this office by the Committee.

I trust that this information, together with the letter forwarded to you by our Accountant, Mr. Irving Solomon, will suffice.

Very truly yours,


Irwin G. Cantor
President

IGC:rl
enc.



"A Professional Corporation"

THE OFFICE OF IRWIN G. CANTOR/CONSULTING ENGINEERS

919 THIRD AVENUE • NEW YORK, NEW YORK 10022



U.S. POSTAGE
GRAND CENTRAL STATION
1105286

Miss Claire Lindsay
Federal Election Committee
1325 K Street N.W.
Washington, D.C. 20463

79 AUG 6 PM 12:56

RECEIVED
FEDERAL ELECTION
COMMISSION

July 24, 1979

Federal Election Commission
1225 E Street N.W.
Washington, D.C.

Re: Castro-Blanco, Piscioneri & Feder,
Architects, P.C.
F.E.C. Ref.: MUR 754

Gentlemen:

We represent the firm of Castro-Blanco, Piscioneri & Feder, Architects, P.C. (hereinafter "CPF"). This letter is in response to the letter dated July 3, 1979, from the Commission's general counsel, Mr. William C. Oldaker, to Mr. David Castro-Blanco and CPF.

The subject of the Commission's inquiry is a \$300.00 political contribution to the Hon. Herman Badillo in 1977. The contribution was made with a check that was drawn on a CPF account. (A photocopy of both sides of the check is enclosed herewith). We have thoroughly investigated the circumstances surrounding the contribution. In our view, CPF has not violated 2 U.S.C. §441b and there is no basis for the Commission to take any action against CPF with respect to the contribution. This conclusion is based on the following:

The contribution was made in connection with a political fundraising dinner for Mr. Badillo in New York City on March 18, 1977. At that time, Mr. Badillo was campaigning for the Democratic Party nomination for Mayor of the City of New York. Mr. Castro-Blanco, one of CPF's principals and the person who signed the check, believed that the sole purpose of the dinner was to raise funds for Mr. Badillo's mayoralty campaign. Desirous of making a contribution to that campaign, but uncertain as to whether a contribution made with a corporate check would be acceptable, Mr. Castro-Blanco got in touch with an individual who was connected with the campaign. (Mr. Castro-Blanco does not recall the name of the person with whom he spoke.) The individual advised Mr. Castro-Blanco that since the contribution was going to be used for the mayoralty campaign,

Federal Election Comm.

July 30, 1978

it could be made with a check drawn on a corporate account. The individual also advised Mr. Castro-Blanco to make the check payable to the dinner chairman, Martin Fife.

When Mr. Castro-Blanco wrote the check, he was wholly unaware that the dinner for Mr. Badillo had a dual purpose, i.e., to raise funds for Mr. Badillo's mayoralty campaign and also to raise funds which would be used to retire the outstanding debt from Mr. Badillo's 1976 campaign for re-election to Congress. Mr. Castro-Blanco was also unaware that separate accounts had been established so that the funds would not be commingled.

After Mr. Castro-Blanco sent the check, it was deposited into the account titled "Friends of Herman Badillo", the proceeds of which were used to retire Mr. Badillo's Congressional campaign debt. The decision to deposit the check into this particular account, rather than into the account whose proceeds were used for the mayoralty campaign, was made by Mr. Fife or a member of his staff. Mr. Castro-Blanco had nothing to do with this decision. In fact, Mr. Castro-Blanco and CPF first learned that the check was used for purposes other than Mr. Badillo's mayoralty campaign when CPF received a letter from Mr. Fife, dated November 9, 1978, advising that the check had been put toward a Federal election campaign fund.

In sum, Mr. Castro-Blanco drew a check on CPF's account in order to make what he believed would be a contribution to Mr. Badillo's mayoralty campaign. Subsequently, without the knowledge or authorization of either himself or CPF, the check was deposited by a person connected with Mr. Badillo to an account whose proceeds were used to retire a campaign debt from a Federal election. We respectfully submit that under these circumstances, CPF's actions do not fall within the ambit of 2 U.S.C. §441b.

Finally, I was advised last week by Mr. Louis Benza, an attorney who acted as counsel to Mr. Badillo during his 1977 mayoralty campaign, and also by Mrs. Jean Pops, a present member of Mr. Badillo's staff at New York City Hall, that the \$300.00 contribution from CPF was to be returned to CPF. After ascertaining that the contribution would be returned, I spoke with Mr. Kenneth Gross, the Commission's Assistant General Counsel, and advised him of this fact. He told me that when CPF received the check returning its contribution, it should endorse it for deposit to its own account, photocopy the front and back of the check and furnish the Commission

VINCENTI & SCHICKLER

Federal Election Comm.

July 24, 1975

with the photocopy. I have related these instructions to Mr. Castro-Blanco and he will send me the aforementioned photocopy. When I receive it, I will forward it to the Commission forthwith.

Please advise us if you require any further information. We assume that the foregoing facts, together with the photocopy of the forthcoming check, will provide an sufficient basis for you to close your inquiry and take no action with respect to CPF.

Respectfully submitted,

VINCENTI & SCHICKLER


Michael F. Youdovin

MFY:nf

cc: Mr. Castro-Blanco - CPF

30040204382

4303
 4303
 4303

Worshipful
 Friends of
 Herman B. Gold
 42-332-0613
 Harlem Ave

42-332-0613
 42-332-0613
 42-332-0613
 42-332-0613

903336

107
 107
 107

1. Order - <i>Harman B. Gold</i> 10 EAST 20TH STREET, NEW YORK, N. Y. 10003		2. Date <i>Jan 17 1977</i>
3. Pay to the order of <i>Harman B. Gold</i>		4. Amount <i>300.00</i>
5. <i>Three hundred dollars</i>		6. Dollars
Irving Trust Company 100 Wall Street, New York 10038		Signature <i>[Signature]</i>
CO210-00676 15 096 844		700000300000

STREET & SCHUYLER

228 BROADWAY
NEW YORK, N.Y. 10007



79 JUL 30 PM 3:05

RECEIVED
FEDERAL ELECTION
COMMISSION

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

80040284384

IRVING SOLOMON
JACK SCHNEIDER
MICHAEL ORENSTEIN
RETIRED PUBLIC ACCOUNTANT

William C. Olsaker, Esq.
% Federal Election Commission
1325 K Street N. W.
Washington D. C. 20003

Re: Professor Yoram A. Seiduk
Executive Vice - President
IGC, P. C.
919 Third Avenue
New York, N. Y. 10022
MUR 954

Dear Sir:

In reply to your letter, this office has located the check drawn to Martin Fife on March 18, 1977. In speaking to Professor Seiduk, we were advised that the \$100.00 check was for a dinner dance which involved some important Spanish speaking citizens of the City of New York.

Since Professor Seiduk is called upon from time to time as a minority engineer, it would be important for him to attend such an affair. I don't believe that this was specifically a fund raiser or a campaign contribution purely for Herman Badillo.

I trust this explanation will satisfy your staff.

My office is at your service for any additional information you may desire.

Very truly yours,

SOLOMON, SCHNEIDER & ORENSTEIN

Irving Solomon
IRVING SOLOMON
JP

IS:jgs
Encl.

0 0 1 2 3 0 4 3 8 6

BY ENDORSEMENT THIS CHECK WHEN PAID IS ACCEPTED IN FULL PAYMENT OF THE FOLLOWING ACCOUNT		3921	
DATE	AMOUNT	THE OFFICE OF IRWIN G. CANTOR, P.C.	
		410 THIRD AVENUE NEW YORK, N. Y. 10022	
DAY TO THE ORDER OF		1-108 210	
100		100	
One hundred and no/100		DOLLARS	
MARINE MIDLAND BANK 410 THIRD AVENUE, NEW YORK, N. Y. 10022		100	
0210-01085 028-70509-07		0000010000	

30040004387

SOLOMON, SCHNEIDER & ORENSTEIN

381 SUNRISE HIGHWAY
LYNDBROOK, NEW YORK 11563



CERTIFIED MAIL
RETURN RECEIPT REQUESTED

William C. Oldaker, Esq.
% Federal Election Commission
1325 K. Street N. W.
Washington, D. C. 20463

65 JUL 22 70P 6L

CERTIFIED

No.

285148

MAIL

MEMORANDUM FOR:

CHARLES SCHULZ

FROM:

HAROLD W. BROWN

DATE:

JULY 25, 1979

SUBJECT:

MR 954 - Interim Investigative Report
signed July 24, 1979, received by SCB
7-25-79, 11:01

The above-named document was circulated to
the Commission on a 24-hour no-objection basis
at 4:00, July 25, 1979.

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

80040304390
In the matter of

The Committee for the Re-Election
of Congressman Herman Badillo
et al.

Interim Investigative Report

On June 20, 1975, the Commission found reason to believe the Committee for the Re-Election of Congressman Herman Badillo violated: 2 U.S.C. §432(a) for failure to retain supporting documentation for expenditures; 2 U.S.C. § 434(b) (9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements; and 2 U.S.C. §441b by accepting labor union contributions from the Pocketbook and Novelty Workers Union.

The Commission at that time found reason to believe that the Friends of Herman Badillo violated 2 U.S.C. §441b by accepting contributions from the Pocketbook and Novelty Workers Union, Joint Council No. 16 International Brotherhood of Teamsters, and the Washable Clothing, Sportswear and Novelty Workers Local 169 Almalgamated Clothing Workers, United American Bank, Union Federal Savings and Loan Association of New York, Equitable Federal Savings and Loan Association of New York, Banco Popular de Puerto Rico, Castro-Blanco, Piscioneri and Feder, P.C., NAC Realty Company, IGC, P.C., and Lipsig, Sullivan, Mollen and Liapakis, P.C. and the El Barrio Chamber of Commerce.

60040204391

The Commission also found reason to believe that Pocketbook and Novelty Workers Union violated 2 U.S.C. § 441b by contributing to the Committee for the Re-Election of Herman Badillo.

Finally the Commission found reason to believe that the Pocketbook and Novelty Workers Union, Joint Council No. 25 International Brotherhood of Teamsters, the Washable Clothing, Sportswear and Novelty Workers Local 159 Amalgamated Clothing Workers, United American Bank, Union Federal Savings and Loan Association of New York, Banco Popular de Puerto Rico, Castro-Blanco, Piscioneri and Feder, P.C., NAC Realty Company, IGC, P.C. and Lipsig, Sullivan, Mollen and Liapakis, P.C. violated 2 U.S.C. § 441b by contributing to the Friends of Herman Badillo.

As of this report, the Office of General Counsel has received calls from the Washable Clothing, Sportswear and Novelty Workers Union, Pocketbook and Novelty Workers Union, Union Federal Savings and Loan, Lipsig, Sullivan, Mollen and Liapakis, and United American Bank. Each of these respondents is placing a written reply in the mail this week. We are attempting to contact the remaining respondents to request their written responses.

7/24/79
Date


William C. Oldaker
General Counsel

July 20, 1979

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20543

903275

Dear Mr. Oldaker:

I am herewith enclosing for your information, a copy of the latest Report filed by our Committee to the Federal Election Commission.

Please note that we have complied with your list of outstanding debts and obligations. We understand that Mr. Scott Mollen of the firm of Lippig, Sullivan, Mollen and Liapakis, P.C. has contacted the FEC and made a full explanation of how the \$1,000.00 contribution was compiled by their firm. In the case of the El Barrio Chamber of Commerce, I am herewith enclosing a letter of explanation from them.

We are still looking for more receipts for our petty cash expenditures, as soon as we find them, we will forward them to the FEC.

Thank you for your attention to this matter.

Very truly yours,


Pedro L. Rodriguez
Treasurer



1840 Lexington Avenue, New York, N. Y. 10016

PRESIDENT

EMILIO DIAZ

FIRST VICE PRESIDENT

ANITA SOTO

SECOND VICE PRESIDENT

ANGILO DE LUON

THIRD VICE PRESIDENT

MANUEL OLIVERA

TREASURER

STEVE FLORES

SECRETARY

SONIA VILAR

MEMBERS OF THE BOARD

ANTONIO FLORES

ANGEL RODRIGUEZ

ROLANDO RODRIGUEZ

HECTOR RODRIGUEZ

RODRIGO RODRIGUEZ

ALTERNATE MEMBER

GERTRUDE ESCARVALLER

December 14, 1978

LOUIS A. MALAVE
Executive Director

Mr. Martin D. Fife
180 Madison Avenue
New York, N. Y. 10016

Dear Mr. Fife:

In reply to your letter of November 10, 1978 regarding a \$50 check drawn on the El Barrio Chamber of Commerce account and payable to Belen Denis in connection with the dinner for the Honorable Herman Badillo at the Essex House, March 18, 1977, please be advised that this represented a personal donation from one of our members and it was rendered through our account.

I apologize for my delay in replying to your letter and for any inconvenience it may have caused.

I take this opportunity to wish you and yours a Merry Christmas and a prosperous New Year.

Sincerely,

Louis A. Malave
Executive Director

LAM/mtv

cc: The Hon. Herman Badillo
Deputy Mayor of New York
City Hall
Mr. Gilberto Ruiz, Pres.
El Barrio Chamber of Commerce

U.S. GOVERNMENT PRINTING OFFICE
1979 O - 340-100
5010-108
Washington, D.C. 20540

Notice: Candidates for election to the office of Representative in Congress shall file this report with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

Committee for the Re-election of

1. Congressman, Edwin S. Martinez F 12-12 061-551

Name of Candidate or Committee (to 500) c/o Pedro L. Rodriguez Registered Treasurer

1414 Metropolitan Avenue

2. Congressman, 21st District, N.Y.

Address (street and street)

Office (house, apartment, etc.) (if applicable)

Brooklyn, N.Y. 11241

City, State and ZIP Code

☐ Check if address is different than previously reported.

Year of Election

3. Type of Report (check appropriate boxes)

☐ April 15 Quarterly Report

☐ Tenth day report preceding _____ session
(primary, general or convention)

☐ Termination Report

☒ July 15 Quarterly Report

on _____ in the State of _____

☐ Amendment for:

☐ October 15 Quarterly Report

(date)

(which report)

☐ January 31 Annual Report

☐ Thirtieth day report following _____ session
(primary, general or convention)

☐ Monthly Report

on _____ in the State of _____
(month) (date)

This is a report for

☐ Primary Election

☐ General Election

☐ Primary and General

☐ Other (special, runoff, etc.)

SUMMARY OF RECEIPTS AND EXPENDITURES

(Figures may be rounded to nearest dollar.)

5 Covering Period	Column A This Period	Column B Calendar Year-To-Date
<u>4/1/79</u> Through <u>7/20/79</u>		
6 Cash on hand January 1, 19 <u>79</u>		\$ 242.90
7 Cash on hand at beginning of reporting period	\$ 242.90	
8 Total receipts (from line 19).	\$ 1635.00	\$ 1635.00
(a) Subtotal (Add lines 7 and 8 for Column A and lines 6 and 8 for Column B)	\$ 1877.90	\$ 1877.90
9 Total expenditures (from line 25).	\$ 1833.00	\$ 1833.00
10 Cash on hand at close of reporting period (Subtract line 9 from line 8a).	\$ 44.90	\$ 44.90
11 Value of contributed items on hand to be liquidated (Attach itemized list)	\$	
12 Debts and obligations owed to the Committee/Candidate (itemize all on Schedule C)	\$	
13 Debts and obligations owed by the Committee/Candidate (itemize all on Schedule C)	\$ 400.00	

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

7/20/79
(Date)

Pedro L. Rodriguez

(Typed Name of Treasurer or Candidate)

[Signature]
(Signature of Treasurer or Candidate)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. Section 437g, or Section 441 (see reverse side of form).

For further
information,
Contact:



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

or call 800/424-9530

Approved by GAO
B-187620 (R0506)
Expires 3-31-81

All previous versions of FEC FORM 3 are obsolete and should no longer be used.

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.

This Report covers a period beyond the June 30th, cut-off date for the July Quarterly Report.

January, 1978
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20005

Business Transactions Only
Other Receipts, Loans

Continuing Lines 10A, 10B, 10C, 10D, 10E, 10F, 10G, 10H, 10I, 10J, 10K, 10L, 10M, 10N, 10O, 10P, 10Q, 10R, 10S, 10T, 10U, 10V, 10W, 10X, 10Y, 10Z, 10AA, 10AB, 10AC, 10AD, 10AE, 10AF, 10AG, 10AH, 10AI, 10AJ, 10AK, 10AL, 10AM, 10AN, 10AO, 10AP, 10AQ, 10AR, 10AS, 10AT, 10AU, 10AV, 10AW, 10AX, 10AY, 10AZ, 10BA, 10BB, 10BC, 10BD, 10BE, 10BF, 10BG, 10BH, 10BI, 10BJ, 10BK, 10BL, 10BM, 10BN, 10BO, 10BP, 10BQ, 10BR, 10BS, 10BT, 10BU, 10BV, 10BW, 10BX, 10BY, 10BZ, 10CA, 10CB, 10CC, 10CD, 10CE, 10CF, 10CG, 10CH, 10CI, 10CJ, 10CK, 10CL, 10CM, 10CN, 10CO, 10CP, 10CQ, 10CR, 10CS, 10CT, 10CU, 10CV, 10CW, 10CX, 10CY, 10CZ, 10DA, 10DB, 10DC, 10DD, 10DE, 10DF, 10DG, 10DH, 10DI, 10DJ, 10DK, 10DL, 10DM, 10DN, 10DO, 10DP, 10DQ, 10DR, 10DS, 10DT, 10DU, 10DV, 10DW, 10DX, 10DY, 10DZ, 10EA, 10EB, 10EC, 10ED, 10EE, 10EF, 10EG, 10EH, 10EI, 10EJ, 10EK, 10EL, 10EM, 10EN, 10EO, 10EP, 10EQ, 10ER, 10ES, 10ET, 10EU, 10EV, 10EW, 10EX, 10EY, 10EZ, 10FA, 10FB, 10FC, 10FD, 10FE, 10FF, 10FG, 10FH, 10FI, 10FJ, 10FK, 10FL, 10FM, 10FN, 10FO, 10FP, 10FQ, 10FR, 10FS, 10FT, 10FU, 10FV, 10FW, 10FX, 10FY, 10FZ, 10GA, 10GB, 10GC, 10GD, 10GE, 10GF, 10GG, 10GH, 10GI, 10GJ, 10GK, 10GL, 10GM, 10GN, 10GO, 10GP, 10GQ, 10GR, 10GS, 10GT, 10GU, 10GV, 10GW, 10GX, 10GY, 10GZ, 10HA, 10HB, 10HC, 10HD, 10HE, 10HF, 10HG, 10HH, 10HI, 10HJ, 10HK, 10HL, 10HM, 10HN, 10HO, 10HP, 10HQ, 10HR, 10HS, 10HT, 10HU, 10HV, 10HW, 10HX, 10HY, 10HZ, 10IA, 10IB, 10IC, 10ID, 10IE, 10IF, 10IG, 10IH, 10II, 10IJ, 10IK, 10IL, 10IM, 10IN, 10IO, 10IP, 10IQ, 10IR, 10IS, 10IT, 10IU, 10IV, 10IW, 10IX, 10IY, 10IZ, 10JA, 10JB, 10JC, 10JD, 10JE, 10JF, 10JG, 10JH, 10JI, 10JJ, 10JK, 10JL, 10JM, 10JN, 10JO, 10JP, 10JQ, 10JR, 10JS, 10JT, 10JU, 10JV, 10JW, 10JX, 10JY, 10JZ, 10KA, 10KB, 10KC, 10KD, 10KE, 10KF, 10KG, 10KH, 10KI, 10KJ, 10KK, 10KL, 10KM, 10KN, 10KO, 10KP, 10KQ, 10KR, 10KS, 10KT, 10KU, 10KV, 10KW, 10KX, 10KY, 10KZ, 10LA, 10LB, 10LC, 10LD, 10LE, 10LF, 10LG, 10LH, 10LI, 10LJ, 10LK, 10LL, 10LM, 10LN, 10LO, 10LP, 10LQ, 10LR, 10LS, 10LT, 10LU, 10LV, 10LW, 10LX, 10LY, 10LZ, 10MA, 10MB, 10MC, 10MD, 10ME, 10MF, 10MG, 10MH, 10MI, 10MJ, 10MK, 10ML, 10MM, 10MN, 10MO, 10MP, 10MQ, 10MR, 10MS, 10MT, 10MU, 10MV, 10MW, 10MX, 10MY, 10MZ, 10NA, 10NB, 10NC, 10ND, 10NE, 10NF, 10NG, 10NH, 10NI, 10NJ, 10NK, 10NL, 10NM, 10NN, 10NO, 10NP, 10NQ, 10NR, 10NS, 10NT, 10NU, 10NV, 10NW, 10NX, 10NY, 10NZ, 10OA, 10OB, 10OC, 10OD, 10OE, 10OF, 10OG, 10OH, 10OI, 10OJ, 10OK, 10OL, 10OM, 10ON, 10OO, 10OP, 10OQ, 10OR, 10OS, 10OT, 10OU, 10OV, 10OW, 10OX, 10OY, 10OZ, 10PA, 10PB, 10PC, 10PD, 10PE, 10PF, 10PG, 10PH, 10PI, 10PJ, 10PK, 10PL, 10PM, 10PN, 10PO, 10PP, 10PQ, 10PR, 10PS, 10PT, 10PU, 10PV, 10PW, 10PX, 10PY, 10PZ, 10QA, 10QB, 10QC, 10QD, 10QE, 10QF, 10QG, 10QH, 10QI, 10QJ, 10QK, 10QL, 10QM, 10QN, 10QO, 10QP, 10QQ, 10QR, 10QS, 10QT, 10QU, 10QV, 10QW, 10QX, 10QY, 10QZ, 10RA, 10RB, 10RC, 10RD, 10RE, 10RF, 10RG, 10RH, 10RI, 10RJ, 10RK, 10RL, 10RM, 10RN, 10RO, 10RP, 10RQ, 10RR, 10RS, 10RT, 10RU, 10RV, 10RW, 10RX, 10RY, 10RZ, 10SA, 10SB, 10SC, 10SD, 10SE, 10SF, 10SG, 10SH, 10SI, 10SJ, 10SK, 10SL, 10SM, 10SN, 10SO, 10SP, 10SQ, 10SR, 10SS, 10ST, 10SU, 10SV, 10SW, 10SX, 10SY, 10SZ, 10TA, 10TB, 10TC, 10TD, 10TE, 10TF, 10TG, 10TH, 10TI, 10TJ, 10TK, 10TL, 10TM, 10TN, 10TO, 10TP, 10TQ, 10TR, 10TS, 10TT, 10TU, 10TV, 10TW, 10TX, 10TY, 10TZ, 10UA, 10UB, 10UC, 10UD, 10UE, 10UF, 10UG, 10UH, 10UI, 10UJ, 10UK, 10UL, 10UM, 10UN, 10UO, 10UP, 10UQ, 10UR, 10US, 10UT, 10UU, 10UV, 10UW, 10UX, 10UY, 10UZ, 10VA, 10VB, 10VC, 10VD, 10VE, 10VF, 10VG, 10VH, 10VI, 10VJ, 10VK, 10VL, 10VM, 10VN, 10VO, 10VP, 10VQ, 10VR, 10VS, 10VT, 10VU, 10VV, 10VW, 10VX, 10VY, 10VZ, 10WA, 10WB, 10WC, 10WD, 10WE, 10WF, 10WG, 10WH, 10WI, 10WJ, 10WK, 10WL, 10WM, 10WN, 10WO, 10WP, 10WQ, 10WR, 10WS, 10WT, 10WU, 10WV, 10WW, 10WX, 10WY, 10WZ, 10XA, 10XB, 10XC, 10XD, 10XE, 10XF, 10XG, 10XH, 10XI, 10XJ, 10XK, 10XL, 10XM, 10XN, 10XO, 10XP, 10XQ, 10XR, 10XS, 10XT, 10XU, 10XV, 10XW, 10XX, 10XY, 10XZ, 10YA, 10YB, 10YC, 10YD, 10YE, 10YF, 10YG, 10YH, 10YI, 10YJ, 10YK, 10YL, 10YM, 10YN, 10YO, 10YP, 10YQ, 10YR, 10YS, 10YT, 10YU, 10YV, 10YW, 10YX, 10YY, 10YZ, 10ZA, 10ZB, 10ZC, 10ZD, 10ZE, 10ZF, 10ZG, 10ZH, 10ZI, 10ZJ, 10ZK, 10ZL, 10ZM, 10ZN, 10ZO, 10ZP, 10ZQ, 10ZR, 10ZS, 10ZT, 10ZU, 10ZV, 10ZW, 10ZX, 10ZY, 10ZZ, 10AA, 10AB, 10AC, 10AD, 10AE, 10AF, 10AG, 10AH, 10AI, 10AJ, 10AK, 10AL, 10AM, 10AN, 10AO, 10AP, 10AQ, 10AR, 10AS, 10AT, 10AU, 10AV, 10AW, 10AX, 10AY, 10AZ, 10BA, 10BB, 10BC, 10BD, 10BE, 10BF, 10BG, 10BH, 10BI, 10BJ, 10BK, 10BL, 10BM, 10BN, 10BO, 10BP, 10BQ, 10BR, 10BS, 10BT, 10BU, 10BV, 10BW, 10BX, 10BY, 10BZ, 10CA, 10CB, 10CC, 10CD, 10CE, 10CF, 10CG, 10CH, 10CI, 10CJ, 10CK, 10CL, 10CM, 10CN, 10CO, 10CP, 10CQ, 10CR, 10CS, 10CT, 10CU, 10CV, 10CW, 10CX, 10CY, 10CZ, 10DA, 10DB, 10DC, 10DD, 10DE, 10DF, 10DG, 10DH, 10DI, 10DJ, 10DK, 10DL, 10DM, 10DN, 10DO, 10DP, 10DQ, 10DR, 10DS, 10DT, 10DU, 10DV, 10DW, 10DX, 10DY, 10DZ, 10EA, 10EB, 10EC, 10ED, 10EE, 10EF, 10EG, 10EH, 10EI, 10EJ, 10EK, 10EL, 10EM, 10EN, 10EO, 10EP, 10EQ, 10ER, 10ES, 10ET, 10EU, 10EV, 10EW, 10EX, 10EY, 10EZ, 10FA, 10FB, 10FC, 10FD, 10FE, 10FF, 10FG, 10FH, 10FI, 10FJ, 10FK, 10FL, 10FM, 10FN, 10FO, 10FP, 10FQ, 10FR, 10FS, 10FT, 10FU, 10FV, 10FW, 10FX, 10FY, 10FZ, 10GA, 10GB, 10GC, 10GD, 10GE, 10GF, 10GG, 10GH, 10GI, 10GJ, 10GK, 10GL, 10GM, 10GN, 10GO, 10GP, 10GQ, 10GR, 10GS, 10GT, 10GU, 10GV, 10GW, 10GX, 10GY, 10GZ, 10HA, 10HB, 10HC, 10HD, 10HE, 10HF, 10HG, 10HH, 10HI, 10HJ, 10HK, 10HL, 10HM, 10HN, 10HO, 10HP, 10HQ, 10HR, 10HS, 10HT, 10HU, 10HV, 10HW, 10HX, 10HY, 10HZ, 10IA, 10IB, 10IC, 10ID, 10IE, 10IF, 10IG, 10IH, 10II, 10IJ, 10IK, 10IL, 10IM, 10IN, 10IO, 10IP, 10IQ, 10IR, 10IS, 10IT, 10IU, 10IV, 10IW, 10IX, 10IY, 10IZ, 10JA, 10JB, 10JC, 10JD, 10JE, 10JF, 10JG, 10JH, 10JI, 10JJ, 10JK, 10JL, 10JM, 10JN, 10JO, 10JP, 10JQ, 10JR, 10JS, 10JT, 10JU, 10JV, 10JW, 10JX, 10JY, 10JZ, 10KA, 10KB, 10KC, 10KD, 10KE, 10KF, 10KG, 10KH, 10KI, 10KJ, 10KK, 10KL, 10KM, 10KN, 10KO, 10KP, 10KQ, 10KR, 10KS, 10KT, 10KU, 10KV, 10KW, 10KX, 10KY, 10KZ, 10LA, 10LB, 10LC, 10LD, 10LE, 10LF, 10LG, 10LH, 10LI, 10LJ, 10LK, 10LM, 10LN, 10LO, 10LP, 10LQ, 10LR, 10LS, 10LT, 10LU, 10LV, 10LW, 10LX, 10LY, 10LZ, 10MA, 10MB, 10MC, 10MD, 10ME, 10MF, 10MG, 10MH, 10MI, 10MJ, 10MK, 10ML, 10MM, 10MN, 10MO, 10MP, 10MQ, 10MR, 10MS, 10MT, 10MU, 10MV, 10MW, 10MX, 10MY, 10MZ, 10NA, 10NB, 10NC, 10ND, 10NE, 10NF, 10NG, 10NH, 10NI, 10NJ, 10NK, 10NL, 10NM, 10NN, 10NO, 10NP, 10NQ, 10NR, 10NS, 10NT, 10NU, 10NV, 10NW, 10NX, 10NY, 10NZ, 10OA, 10OB, 10OC, 10OD, 10OE, 10OF, 10OG, 10OH, 10OI, 10OJ, 10OK, 10OL, 10OM, 10ON, 10OO, 10OP, 10OQ, 10OR, 10OS, 10OT, 10OU, 10OV, 10OW, 10OX, 10OY, 10OZ, 10PA, 10PB, 10PC, 10PD, 10PE, 10PF, 10PG, 10PH, 10PI, 10PJ, 10PK, 10PL, 10PM, 10PN, 10PO, 10PP, 10PQ, 10PR, 10PS, 10PT, 10PU, 10PV, 10PW, 10PX, 10PY, 10PZ, 10QA, 10QB, 10QC, 10QD, 10QE, 10QF, 10QG, 10QH, 10QI, 10QJ, 10QK, 10QL, 10QM, 10QN, 10QO, 10QP, 10QQ, 10QR, 10QS, 10QT, 10QU, 10QV, 10QW, 10QX, 10QY, 10QZ, 10RA, 10RB, 10RC, 10RD, 10RE, 10RF, 10RG, 10RH, 10RI, 10RJ, 10RK, 10RL, 10RM, 10RN, 10RO, 10RP, 10RQ, 10RR, 10RS, 10RT, 10RU, 10RV, 10RW, 10RX, 10RY, 10RZ, 10SA, 10SB, 10SC, 10SD, 10SE, 10SF, 10SG, 10SH, 10SI, 10SJ, 10SK, 10SL, 10SM, 10SN, 10SO, 10SP, 10SQ, 10SR, 10SS, 10ST, 10SU, 10SV, 10SW, 10SX, 10SY, 10SZ, 10TA, 10TB, 10TC, 10TD, 10TE, 10TF, 10TG, 10TH, 10TI, 10TJ, 10TK, 10TL, 10TM, 10TN, 10TO, 10TP, 10TQ, 10TR, 10TS, 10TT, 10TU, 10TV, 10TW, 10TX, 10TY, 10TZ, 10UA, 10UB, 10UC, 10UD, 10UE, 10UF, 10UG, 10UH, 10UI, 10UJ, 10UK, 10UL, 10UM, 10UN, 10UO, 10UP, 10UQ, 10UR, 10US, 10UT, 10UU, 10UV, 10UW, 10UX, 10UY, 10UZ, 10VA, 10VB, 10VC, 10VD, 10VE, 10VF, 10VG, 10VH, 10VI, 10VJ, 10VK, 10VL, 10VM, 10VN, 10VO, 10VP, 10VQ, 10VR, 10VS, 10VT, 10VU, 10VV, 10VW, 10VX, 10VY, 10VZ, 10WA, 10WB, 10WC, 10WD, 10WE, 10WF, 10WG, 10WH, 10WI, 10WJ, 10WK, 10WL, 10WM, 10WN, 10WO, 10WP, 10WQ, 10WR, 10WS, 10WT, 10WU, 10WV, 10WW, 10WX, 10WY, 10WZ, 10XA, 10XB, 10XC, 10XD, 10XE, 10XF, 10XG, 10XH, 10XI, 10XJ, 10XK, 10XL, 10XM, 10XN, 10XO, 10XP, 10XQ, 10XR, 10XS, 10XT, 10XU, 10XV, 10XW, 10XX, 10XY, 10XZ, 10YA, 10YB, 10YC, 10YD, 10YE, 10YF, 10YG, 10YH, 10YI, 10YJ, 10YK, 10YL, 10YM, 10YN, 10YO, 10YP, 10YQ, 10YR, 10YS, 10YT, 10YU, 10YV, 10YW, 10YX, 10YY, 10YZ, 10ZA, 10ZB, 10ZC, 10ZD, 10ZE, 10ZF, 10ZG, 10ZH, 10ZI, 10ZJ, 10ZK, 10ZL, 10ZM, 10ZN, 10ZO, 10ZP, 10ZQ, 10ZR, 10ZS, 10ZT, 10ZU, 10ZV, 10ZW, 10ZX, 10ZY, 10ZZ

Name of Candidate or Committee in Full
Committee for the Re-election of Congressman Herman Badillo

Full Name, Mailing Address and ZIP Code Pedro L. Rodriguez 1414 Metropolitan Avenue Bronx, New York	Principal Place of Business 1414 Metropolitan Avenue Bronx, New York Occupation Dentist	Date (month, day, year) 6/29/79	Amount of each Receipt this Period \$500.00
Receipt for: ☒ Primary ☐ General ☐ Other		☒ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 1,500.00	
Full Name, Mailing Address and ZIP Code Rigo M. Morales 1211 Gerard Avenue Bronx, New York	Principal Place of Business 1211 Gerard Avenue Bronx, New York Occupation Psychiatrist	Date (month, day, year) 6/29/79	Amount of each Receipt this Period 500.00
Receipt for: ☒ Primary ☒ General ☐ Other		☒ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 500.00	
Full Name, Mailing Address and ZIP Code Victor M. Albano 147 East 117th Street New York, NY	Principal Place of Business 250 Broadway New York, NY Occupation Cab Worker	Date (month, day, year) 7/20/79	Amount of each Receipt this Period 100.00
Receipt for: ☒ Primary ☒ General ☐ Other		☒ Check if Contributor is self-employed Aggregate Year-To-Date ... \$ 100.00	
Full Name, Mailing Address and ZIP Code Jerome Belson 32 Broadway New York, N.Y. 10004	Principal Place of Business 32 Broadway Occupation Attorney	Date (month, day, year) 7/20/79	Amount of each Receipt this Period 500.00
Receipt for: ☒ Primary ☒ General ☐ Other		☒ Check if Contributor is self-employed Aggregate Year-To-Date ... \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$	
Full Name, Mailing Address and ZIP Code	Principal Place of Business Occupation	Date (month, day, year)	Amount of each Receipt this Period
Receipt for: ☐ Primary ☐ General ☐ Other		☐ Check if Contributor is self-employed Aggregate Year-To-Date ... \$	
SUBTOTAL of receipts this page (optional).			\$
TOTAL this period (last page this line number only).			\$ 1600.00

Committee Name
 Full Name, Mailing Address and ZIP Code
 1120 E. 12th St.
 Washington, D.C. 20002

Reporting Period
 From: 7/1/79 To: 7/31/79
 Submitting Unit: Local, State, Federal, or Other
 of FEC Form 1

Name of Candidate or Officeholder in Full
 Committee for the Re-Election of Congressman Herman Badillo

Full Name, Mailing Address and ZIP Code Castro-Blanco, Pasioneri & Feder, P.C. 10 East 39th Street New York, N.Y. 10016	Particulars of Expenditure Refund of contribution as per FEC Expenditure for: ☒ Primary ☒ General ☐ Other	Date (month, day, year) 7/20/79	Amount of each expenditure this period 300.00
Full Name, Mailing Address and ZIP Code United Americas Bank 50 Broadway New York, N.Y. 10004	Particulars of Expenditure Refund of contribution as per FEC Expenditure for: ☒ Primary ☒ General ☐ Other	Date (month, day, year) 7/20/79	Amount of each expenditure this period 100.00 200.00
Full Name, Mailing Address and ZIP Code Union Federal Savings & Loan Assoc. of N.Y. 200 East 23rd Street New York, N.Y. 10010	Particulars of Expenditure Refund of contribution as per FEC Expenditure for: ☒ Primary ☒ General ☐ Other	Date (month, day, year) 7/20/79	Amount of each expenditure this period 100.00
Full Name, Mailing Address and ZIP Code Equitable Savings & Loan Assoc. of NY P.O. Box 1025 Brooklyn, New York 11201	Particulars of Expenditure Refund of contribution as per FEC Expenditure for: ☒ Primary ☒ General ☐ Other	Date (month, day, year) 7/20/79	Amount of each expenditure this period 100.00
Full Name, Mailing Address and ZIP Code Banco Popular de Puerto Rico 7 West 51st Street New York, N.Y. 10019	Particulars of Expenditure Refund of contribution as per FEC Expenditure for: ☒ Primary ☒ General ☐ Other	Date (month, day, year) 7/20/79	Amount of each expenditure this period 200.00
Full Name, Mailing Address and ZIP Code Pocketbook & Novelty Workers Union-Community Fund 149 Fifth Avenue New York, N.Y. 10010	Particulars of Expenditure Refund of contribution as per FEC Expenditure for: ☒ Primary ☒ General ☐ Other	Date (month, day, year) 7/20/79	Amount of each expenditure this period 100.00 200.00 300.00
Full Name, Mailing Address and ZIP Code Con Edison 1 Irving Place New York, N.Y.	Particulars of Expenditure Electric Bill Expenditure for: ☒ Primary ☒ General ☐ Other	Date (month, day, year) 5/28/79	Amount of each expenditure this period 233.00
Full Name, Mailing Address and ZIP Code Washable Clothing Sportswear & Novelty Workers Union-Local 169 33 West 14th Street New York, NY 10011	Particulars of Expenditure Refund of contribution as per FEC Expenditure for: ☒ Primary ☒ General ☐ Other	Date (month, day, year) 7/20/79	Amount of each expenditure this period 200.00
SUBTOTAL of expenditures this page (optional)			\$ 1733.00
TOTAL this period (last page this line number only)			\$

30040397

Committee for the Re-Election of Congressman Herman Badillo			
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure Refund of contribution as per FEC	Date (month, day, year)	Amount of each expenditure this period
Irwin G. Cantor, P.C. 919 Third Avenue New York, N.Y. 10022	Expenditure for: ☒ Primary ☐ General ☐ Other	7/20/79	100.00
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
Full Name, Mailing Address and ZIP Code	Particulars of Expenditure	Date (month, day, year)	Amount of each expenditure this period
	Expenditure for: ☐ Primary ☐ General ☐ Other		
SUBTOTAL of expenditures this page (optional).			\$100.00
TOTAL this period (last page this line number only).			\$1,833.00

FEDERAL ELECTION COMMISSION
 1000 K Street, N.W.
 Washington, D.C. 20543

Name of Candidate and Committee in Full

Committee for the Re-Election of Congressman William Bradley

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
NAC Realty 2241 Conner Street Bronx, N.Y. 10466				
☐ Primary ☒ General ☐ Other		\$ 200.00	\$ -0-	\$ 200.00

NATURE OF OBLIGATION (Details of Debt):

As per the FEC we are obligated to return this money, which was a campaign contribution

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
Joint Council #16, IDT 265 West 14th Street New York, N.Y. 10011				
☐ Primary ☒ General ☐ Other		\$ 200.00	\$ -0-	\$ 200.00

NATURE OF OBLIGATION (Details of Debt):

As per the FEC we are obligated to return this money, which was a campaign contribution.

Full Name, Mailing Address and ZIP Code of Debtor or Creditor	Date (month, day, year)	Amount of Original Debt, Contract, Agreement or Promise	Cumulative Payment To Date	Outstanding Balance at Close of This Period
☐ Primary ☐ General ☐ Other		\$	\$	\$

NATURE OF OBLIGATION (Details of Debt):

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

Carry outstanding balance only to appropriate line of summary.

00040004398

NAME OF CANDIDATE OR COMMITTEE Committee for the Re-election of Congressman Gerald R. Sullivan		PERIOD COVERED BY THIS REPORT FROM: 1-1-75 TO: 1-1-76	
		Column A This Period	Column B Calendar Year To Date
14. Contributions from Individuals (Itemize on Schedule A):			
(a) Itemized (use Schedule A)	\$ 2,600.00		
(b) Unitemized	\$ 35.00		
(c) Sales and collections included above: List by event on memo Schedule D (2)			
(d) Subtotal of contributions from individuals	\$ 2,635.00	\$ 2,635.00	
15. Transfers from Political Committees:			
(a) Funds from affiliated/authorized committees (itemize on Schedule A regardless of amount)	\$		
(b) Funds from other committees (itemize on Schedule A regardless of amount)	\$		
(c) Contributions in-kind from political committees (itemize on Schedule A regardless of amount)	\$		
(d) Subtotal of transfers in and contributions in-kind from political committees	\$ -0-	\$ -0-	
16. Other Income:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of other income	\$ -0-	\$ -0-	
17. Loans and Loan Repayments Received:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments received	\$ -0-	\$ -0-	
18. Refunds, Rebates, Returns of Deposits:			
(a) Itemized (use Schedule A)	\$		
(b) Unitemized	\$		
(c) Subtotal of refunds, rebates, returns of deposits	\$ -0-	\$ -0-	
19. Total Receipts	\$ 1,635.00	\$ 1,635.00	
EXPENDITURES			
20. Operating Expenditures:			
(a) Itemized (use Schedule B)	\$ 233.00		
(b) Unitemized	\$		
(c) Subtotal of operating expenditures	\$ 233.00	\$ 233.00	
21. Loans, Loan Repayments, and Contribution Refunds Made:			
(a) Itemized (use Schedule B)	\$		
(b) Unitemized	\$		
(c) Subtotal of loans and loan repayments made and contribution refunds	\$ 1,600.00	\$ 1,600.00	
22. Transfers Out to Political Committees:			
(a) To affiliated/authorized committee (itemize on Schedule B regardless of amount)	\$		
(b) To other committees (itemize on Schedule B regardless of amount)	\$		
(c) Contributions in-kind to other committees (itemize on Schedule B regardless of amount)	\$		
(d) Subtotal of transfers out	\$ -0-	\$ -0-	
23. Independent Expenditures (use Schedule E)	\$	\$	
24. Coordinated Expenditures Made by Political Committees (2 U.S.C. 441a(d)) (itemize on Schedule F)	\$ -0-	\$ -0-	
25. Total Expenditures	\$ 1,833.00	\$ 1,833.00	
RECEIPTS AND EXPENDITURES, NET OF TRANSFERS TO AND FROM AFFILIATED COMMITTEES			
26. Total Receipts (from line 19)	\$ 1,635.00		
27. Transfers In (from line 15(a))	\$		
28. Net Receipts (Subtract line 27 from line 26)	\$ 1,635.00		
29. Total Expenditures (from line 25)	\$ 1,833.00		
30. Transfers Out (from line 22(a))	\$		
31. Net Expenditures (Subtract line 30 from line 29)	\$ 1,833.00		

COMMUNITY FOR

75 JUL 23 PM 12:00

July 19, 1979

RECEIVED
FEDERAL ELECTION COMMISSION
JUL 25 AM 11:21
CLERK OF SUPREME COURT

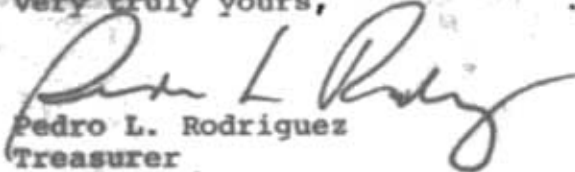
Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

The enclosed copy of the Statement of Organization for the Friends of Herman Badillo Committee, was inadvertently left out of the letter we sent you.

I am sorry for any inconvenience this may have caused.

Very truly yours,


Pedro L. Rodriguez
Treasurer

80040204400

00040204401

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with the campaign for federal office must file this statement with respect to each election.

1a) Name of Committee (its full name) **FRIENDS OF HERMAN BADILLO** 1b) Identification Number **1009256**

1c) Address (number and street) **G.P.O. BOX 6** 1d) Date of registration (month and year) **March 3, 1977**

1e) City, State and ZIP code **BRONX, N.Y. 10451** 1f) Is this an amended statement? ☐ Yes ☒ No

2 Check one:
☒ (a) This committee has been designated as the principal campaign committee for a candidate for _____ in the _____ (General, Primary, Runoff, etc.) Election(s) to be held in the State of _____ on _____ (Date(s)).
 (The Principal Campaign Committee will forward to the Commission a copy of the Statement of Organization for each candidate required to file with it.)

☒ (b) This committee is supporting only one candidate, and is authorized by **Herman Badillo** Congressional (Name of Candidate) to receive contributions and make expenditures with respect to the **Primary Election-9/76-Primary-1977** Election(s) held on _____, and will file all reports and statements with the candidate's principal campaign committee, **Committee for the Re-Election of Congressman Herman Badillo** (Full name of principal campaign committee)

(Attach a copy of Candidate's written authorization.) (FEC Form 2a)

☐ (c) This committee supports only one candidate _____ but is not an authorized committee. (Name of Candidate)
☐ (d) This committee is a multicandidate committee.
☐ (e) This committee is a _____ committee of the _____ Party. (National, state, county, city) (Democratic, Republican, etc.)

6 Name of affiliated or connected organization	Mailing address and ZIP code	Relationship
COMMITTEE FOR THE RE-ELECTION OF CONGRESSMAN HERMAN BADILLO	G.P.O. BOX 6 Bronx, N.Y. 10451	Principal campaign committee

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

NY 100
 100-100000000
 100-100000000

STATEMENT OF ORGANIZATION

7 Area, Scope and Description of Organization

- (a) Will this committee operate in more than one State? ☐ Yes ☒ No
- (b) Will it operate on a statewide basis in one State? ☐ Yes ☒ No
- (c) Will it primarily support candidates existing State or local office? ☐ Yes ☒ No

8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
Herman Badillo	405 West 259th Street Bronx, N.Y. 10471	Congressman 21st District, N.Y.	Democratic
Herman Badillo	405 West 259th Street Bronx, N.Y. 10471	Mayor of the City of New York	Democratic

(b) List by name, address, office sought, and party affiliation, any candidate(s) for any other public office(s) that this committee is supporting (unless the committee is supporting the entire ticket of a party as indicated in line 9)

Full name(s) of candidate(s)	Mailing address and ZIP code	Office sought	Party
NONE			

9 If this committee is supporting the entire ticket of a party, give name of party ☒ NO

10 Identify by name, address and position, the person in possession of committee books and records:

Full name	Mailing address and ZIP code	Title or position
Martin Fife	180 Madison Avenue New York, N.Y. 10016	Treasurer

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

30040204402

00040204403

NAME OF COMMITTEE		
Full name	Mailing address	Position
Martin Pile	100 Madison Avenue New York, N.Y. 10016	Treasurer
Hugo Morales	1211 Gerard Avenue Brooklyn, N.Y. 10453	Chairman
Esmerino Martinez	1145 Mott Street Bronx, N.Y. 10472	Secretary

12 Does this committee plan to pay in advance beyond the current calendar year? ☐ Yes ☒ No
 If "Yes" for how long? _____

13 In the event of dissolution, what disposition will be made of residual funds? No residual funds anticipated.

14 List all banks or other repositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds:

Name of bank, repository, etc.	Mailing address and ZIP code
Bankers Trust Company	350 Fifth Avenue, New York, N.Y. 10001

15 List all election reports required to be filed by this committee with States and local jurisdictions, together with the names, addresses, and positions of the recipients of the reports (other than reports filed with Secretaries of State pursuant to USC 439(a)):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code
New York City Board of Elections	see attached	Commissioners, Board of Elections	80 Varick Street New York, N.Y. 10013

Submit additional information on separate continuation sheets appropriately labeled and attached to this Statement of Organization. Indicate in the appropriate section above when information is continued on separate page(s).

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

[Signature] (Signature of Treasurer) 3/16/77 (Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 441 (text on reverse side of form).

Additional Information for #5B -- page 1
#7C -- page 2

The purpose of this Committee is to receive funds from a fund raising dinner to be held on March 18th, 1977. The monies received will be allocated for 2 purposes:

1. To pay off any outstanding debts due by the principal campaign committee, Committee for the Re-Election of Congressman Herman Badillo, G.P.O. Box 6, Bronx, N.Y. 10451 from the Primary Election held on September 14, 1976, for the re-election of Congressman Badillo in the 21st Congressional District in N.Y.; 2. To pay for a political poll and the possible starting operation for a mayoralty candidacy for Herman Badillo in the City of New York for the September, 1977 Primary. The monies collected from this dinner (3/18/77) will be earmarked at the time of their receipt as to whether they will be used for the Congressional Primary debt or for the Mayoralty candidacy. Although these monies will be earmarked in a bookkeeping operation they will be co-mingled in one account at Bankers Trust Company. The account will be opened this week and it is possible that we may receive contributions from Corporation and that these funds will be deposited and earmarked for the mayoralty portion of expenses. I have previously written to the Federal Election Commission advising them of this intention (see letter of Louis C. Benza dated 2/23/77) I have also spoken to Mr. Jonathan Tyson of your office advising him of our intention. We would appreciate knowing if you have any problems with this proposal. Realizing of course that time is of the essence we will be filing the necessary reports with the New York City Board of Elections which is the Agency responsible for campaign financial reports in the City of New York.

Additional Information-#15-- page 3

Dates required

25 days pre-primary
10 days pre-primary
20 days post primary
25 days pre-election
10 days pre-election
20 days post election

Committee For the Re-Election
of Congressman Herman Badillo
c/o Pedro L. Rodriguez
1414 Metropolitan Avenue
Bronx, N.Y. 10462



360

REGISTERED
NO. 311636

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

FIRST CLASS

RETURN RECEIPT REQUESTED

0040004496
CONGRESSMAN HERMAN BADILLO
/o Pedro L. Rodriguez
414 Metropolitan Avenue
Bronx, N.Y. 10462

RECEIVED
FEDERAL ELECTION
COMMISSION

JUL 26 AM 11:59

REGISTERED
705388
RETURN RECEIPT REQUESTED

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



U.S. POSTAGE

348



100-440304407

ADAM
ALAN
ANDREW
ARTHUR
BENJAMIN
BRIAN
BRYAN
CAROL
CHARLES
CHRISTOPHER
DAVID
DEAN
DENNIS
DREW
EDWARD
ERNEST
FRANK
GARY
GEOFFREY
GREGORY
HAROLD
HENRY
HOWARD
JAMES
JEROME
JOHN
JOSEPH
JULIAN
KENNETH
LEONARD
LLOYD
LYNN
MARION
MARTIN
MICHAEL
MILTON
MONTE
MURRAY
NATHAN
NORMAN
OLIVER
OSCAR
PETER
PHILIP
RALPH
ROBERT
ROGER
SAMUEL
SEYMOUR
SHERMAN
SIDNEY
STEPHEN
TERRY
THOMAS
TIMOTHY
VICTOR
WALTER
WILLIAM
WYATT
YVES
ZACHARY

*MEMBER OF THE HOUSE OF REPRESENTATIVES
*MEMBER OF THE SENATE
*MEMBER OF THE SUPREME COURT
*MEMBER OF THE JUDICIAL BRANCH

JULY 23, 1979

603265

NEEDHAM HILLS
FRONT STREET & PHILLIP STREET
ST. MARTIN, N.H.

Ms. Clare Lindsay
Federal Election Commission
1325 E. Street, N.W.
Washington, D.C. 20463

Re: MUR 954

Dear Ms. Lindsay:

Confirming our telephone conversation this afternoon, we will prepare a letter with the specific information along the lines which we discussed this afternoon, which will delineate that the contributions were personal in nature.

Thank you for your cooperation.

Very truly yours,



SCOTT Z. MOLLEN

SEM/mt

SEN/mt

30040204403
LIPSIG, SULLIVAN, MOLLEN & LIAPANE, P.C.
100 CHURCH STREET - NEW YORK, N.Y. 10007



015

Ms. Clare Lindsay
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

79 JUL 26 AM 9:37

RECEIVED
FEDERAL ELECTION
COMMISSION

July 18, 1976

Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20563

Dear Mr. Oldaker:

The Committee for the Re-Election of Congressman Herman Badillo filed two Reports in the year 1976 which showed cash expenditures of \$3,187.00, with explanations for said expenditures.

This amount was used during the period from June 14th, 1976 through August 31st, 1976, for the specific purpose of running an efficient petition operation. The expenditures were used for volunteers in the petition gathering operation from June 14th, 1976 through July 15th, 1976 and for the volunteer work done at the Board of Elections, on the petition challenge from July 15th, 1976 through August 31st, 1976.

I am sure that you are aware that the petition and petition challenging operation uses many volunteers. Petty cash was used to feed and reimburse expenditures made by these volunteers. There were many miscellaneous expenses incurred at the Board of Elections, including subpoena and copying fees which can only be paid with cash. In one day \$150.00 to \$300.00 could be expended for these purposes. When you realize that we are talking about a period of almost 45 days, with hundreds of volunteers working, the sum of \$3,187.00 is miniscule. We urged all of our volunteers to bring in the receipts for the few dollars they received for food and carfare, but we very rarely, if ever, received any. Most times we made notes of the expenditures, recording what the cash was spent for; if a receipt came back it was attached to the note and filed. (We are still looking for these receipts and notes).

19 JUL 24 PM 12:53

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

80040204110

I further feel that if you realized the conditions we were dealing with, you would know the types of people we faced. The 21st Congressional District of New York, was probably the poorest constituency in our Country. These people felt that their only hope for the future lay in Herman Badillo and his remaining a Congressman. They worked day and night, putting in at times, as much as 12 hours a day. They climbed stairs getting signatures to put him on the ballot, and when these signatures were challenged, they came out in droves to help us at the Board of Election. (If you contact the Bronx Board of Elections, I am sure that they will verify this). These poor people had to be repaid for their expenses, and in many cases we had to give them carfare for the following day, so that they could come back to help us. If we had insisted upon the receipts and had asked them to account to us for every penny, we would have lost them, they would have felt that we mistrusted them, and they would not have come back to help us. Poor people have as much pride and perhaps more than their more affluent counterparts. The monies that we gave them as individuals was miniscule, \$1.00 for carfare, money for sodas, money for a cup of coffee and piece of cake, money for a sandwich. What we are talking about is a \$1.00 here, \$2.00 there, small sums, but amounts that tend to add up, we found, in the long run.

There is one other factor that we would ask you to take into consideration, at the end of 1977 we moved from our Congressional Office and in the moving, many, many things were misplaced and/or lost. As Mr. Nuthen of the FEC can tell you, many of the receipts and checks we thought were missing were eventually found. We have not stopped looking for our records, which were stored in a basement, and if we do find more of the receipts we would be most delighted to forward them to you.

As you can see from this statement of facts and I hope from the documentation, when we find it, that although these checks were made out to cash in excess of \$100.00, the aggregate amount given to any one person was never over \$100.00, and no one expenditure exceeded \$100.00. I realize it is difficult for you to accept this statement without it being backed up by a myriad of receipts. We hope our continuing search for documentation will be successful.

For the month of September, 1976, there was a total cash expenditure of \$4,035.00, of that \$4,035.00, \$1,850.00 in cash was redeposited in the account after the September 14th, 1976 Primary. That leaves a total of \$2,185.00 that was actually expended for cash disbursements for the actual Primary Day operation. You must realize that between 300 to 500 volunteers were used in this hotly contested Primary. These people had to be supplied with carfare, gas money, food money, and dimes for making phone calls from polling places. These calls were made from the polling places to the headquarters regarding any trouble situation at the polls, asking for relief (so the poll watcher could get either breakfast, lunch or dinner), and to phone in the results at the closing of the polls. It is very difficult to ask for receipts for quarters and dollars expended for this purpose, however, as stated before, we are still looking through files to find whatever documentation we can.

When you review the Report and the cooperation that has been ^{given} given to the Auditors, you will see that we have made every effort to comply with your request. We will continue to search and I am sure that we will come up with more documentation.

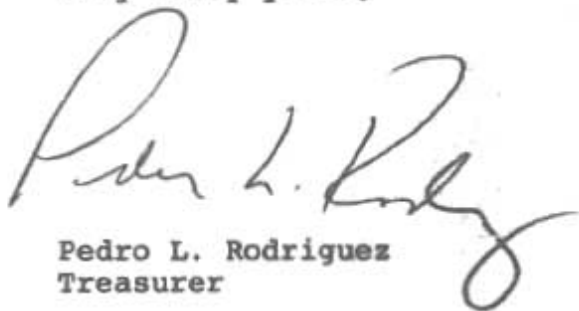
The comment you make in your letter concerning the lumber, paint and sound equipment must be reconciled with the fact that we were making our own signs in this campaign and piecing together parts of sound equipment from many sources. It was not possible to write a check for these items as they were picked up from place to place and not from any one vendor.

Concerning prohibitive contributions:

I am submitting to you a copy of the application for formation of the Friends of Herman Badillo Committee. From this application the Federal Election Commission advised that the purpose of this Committee was to have a fundraiser (Dinner at the Essex House, NYC), to raise funds for the purpose of paying off the deficit owed by the Committee for the Re-Election of Congressman Herman Badillo and the balance was to test the waters for a possible Mayoralty Race for Mr. Badillo. We advised in this statement that possible contributions not acceptable for Federal office might be received at this fund-raiser. In order to avoid possible conflicts another Committee was formed for the Mayoralty called, New York Citizens for Badillo. The Treasurer of both Committees was Martin Fife. The corporate checks and other checks not acceptable to FEC regulations were to be deposited in the Mayoralty Committee, however, by mistake some of these were deposited in the Federal Committee. These are the contributions now being complained about. The \$1,000.00 contribution from Lipsig, Sullivan, Mollen and Liapakis, P.C. and the \$300.00 contribution from Castro-Blanco, Piscioneri & Feder, P.C., are contributions that might be allowable under FEC regulations, if the contributions were charged directly to the partners. We have written letter to these partners asking them to explain how these contributions were made. Upon receipt of these letters we will forward them to you. As to the balance of the contributions, the Committee is ready to return the money.

We are awaiting your reply.

Very truly yours,


Pedro L. Rodriguez
Treasurer

0004030412

Committee for the Re-Election of
Congressman Herman Badillo
c/o Pedro L. Rodriguez
1414 Metropolitan Avenue
Bronx, New York 10462



Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



JUL 24 PM 12 13

00402044

July 19, 1979

563205

Mr. Clare Lindsey
Federal Election Commission
1315 F Street, N.W.
Washington, D. C. 20543

Re: MEK 934
Mac Realty Corporation

Dear Mr. Lindsey:

As we discussed by phone, Mac Realty Corp. was dissolved many years ago by New York State. I am enclosing some proof sent to me by our client's attorney showing the dissolution in 1971. If New York State maintains that Mac Realty is an active corporation, I suggest you find out who is paying the annual taxes.

Please advise the Mac Realty Company, a partnership, as to the outcome of this matter. If I can be of any further help, please do not hesitate to call us.

Very truly yours,

Jane S. Anchin

JA/lbp
Enc.

79 JUL 23 PM 12:58

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

State of New York
COUNTY AND BOROUGH OF BRONX

RECEIVED
FEDERAL ELECTION
COMMISSION

79 JUL 23 AM 10:20

To the Creditors of and
against MAC REALTY CORP.
NOTICE is hereby given by
MAC REALTY CORP., which has
been admitted to the status of a
corporation in the State of New
York, that on the 15th day of September, 1971,
pursuant to Section 1357 of the
Corporation Law of the State of New
York, all creditors of said corporation
are hereby notified to present their
claims, including any and all
unpaid or contingent claims, to the
person named herein, at the address
where said corporation has its principal
office, and in doing so to file with
the person named herein a written
statement of the amount and nature of
said Corporation's debt to them, and
to file with said statement a copy of
said Corporation's balance sheet as of
the day of March, 1971, or such other
date as may be determined by the
court, and against the property of said
corporation and its directors and officers.

A. GERALD DOYLE, being duly sworn, says that he is the Principal
Clerk of the publisher of Bronx Free-Press, a newspaper published
in the County of Bronx; the advertisement herein contained has been
regularly published in the said Bronx Free-Press.

to wit, on 9/20 1971
and on 10/7 1971

A. Gerald Doyle

Sworn to before me this 7th day of October 1971 } *Helen C. McCauley*

HELEN C. McCauley
Notary Public, State of New York
No. 31-25938-0
Qualified in New York County
Exp. 12/31/72

00040304415

CONFIDENTIAL
REFUSE SECURITY INFORMATION

NAC Realty Corporation
2241 Conner Street
Bronx, New York 10456

Re: NYC 954

Gentlemen:

This letter is to inform you that the Commission has found reason to believe NAC Realty Corporation made a corporate contribution in March 1977 to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a federal election.

We have reviewed a copy of your letter, dated November 15, 1978, to Martin Fife which states that NAC Realty Corporation is no longer incorporated. However, our check with the Secretary of State in New York reveals that NAC Realty Corporation is still active.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



This letter and its contents shall remain confidential
in accordance with E.O. 12958-1 437g(a)(3) unless you state
to the Commission in writing that you wish the investigation
to be made public. The staff member assigned to this matter
is Clara Lindsey, who can be reached at (202) 523-4060.

Sincerely,



William C. Oldaker
General Counsel

80040204417

00040201418

ANCHIN, BLOCK & ANCHIN
270 MADISON AVENUE
NEW YORK, N. Y. 10016



Ms. Clare Lindsay
Federal Election Commission
1325 K Street, N. W.
Washington, D. C. 20463

79 JUL 23 AM 10:25

RECEIVED
FEDERAL ELECTION
COMMISSION

DOUGLAS JAMES

No.

Pay to the
order of

Equitable Federal S & L \$100.00

1-12
210

One Hundred and 00/100 Dollars

CHEMICAL BANK

80 Court Street
Brooklyn, N.Y. 11201

Memo

⑆0210⑉0012⑆ 012-213837⑆

⑆0000010000⑆

4004020443

100
JAN 18 1973
ON DEPOSIT ONLY
PRIVATE FEDERAL SAVINGS &
LOAN ASSOCIATION OF NEW YORK
A/C # 311-20220

NEW YORK
F.E.G. 1-12
800020078

PAY TO THE ORDER OF
CITIBANK

July 13, 1979

803204

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

Re: MUR 934

Attention: Clara Lindsay

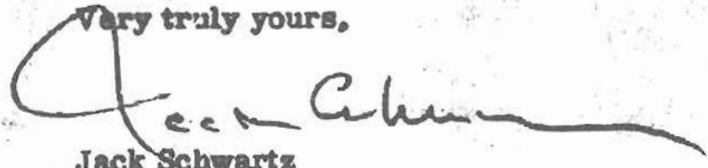
Gentlemen:

This will acknowledge your letter of July 3, 1979 with respect to the above captioned matter.

Kindly be advised that it had previously come to our attention that an individual contribution in connection with a Federal election had been made as a result of an oversight on our part. Accordingly on January 17th, 1979, a personal check was made payable to this Association, deposited to the account of the Association, and a reversal made on our books on said date effectively canceling out the improper entry of March 1977.

For your further information I am enclosing herewith a photostatic copy of the check in question indicating payment to Equitable Federal and the endorsement thereon. We trust this will serve to clear up this matter to your satisfaction.

Very truly yours,



Jack Schwartz
Senior Vice President

79 JUL 23 PM 12:58

JS:ml
Enc.

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

DEPT.
P. O. BOX 1025
BROOKLYN, N. Y.
11201



Federal Election Commission
1325 K Street N. W.

WASHINGTON, D. C. 20463
JUL 23 AM 10:25

RECEIVED
FEDERAL ELECTION COMMISSION
Attention: ~~NON-CONFIDENTIAL~~

60040084422

100-40204423

Mr. J. Edgar Hoover
Mr. W. A. Rorer
Mr. C. L. Smith
Mr. J. B. Connelley
Mr. J. P. Mohr
Mr. J. E. Casper
Mr. J. A. Jones
Mr. J. M. Ladd
Mr. J. R. Nichols
Mr. J. S. Rosen
Mr. J. T. Sullivan
Mr. J. W. Tamm
Mr. J. Z. Smith
Mr. J. B. Connelley
Mr. J. P. Mohr
Mr. J. E. Casper
Mr. J. A. Jones
Mr. J. M. Ladd
Mr. J. R. Nichols
Mr. J. S. Rosen
Mr. J. T. Sullivan
Mr. J. W. Tamm
Mr. J. Z. Smith

* Mr. J. Edgar Hoover
* Mr. W. A. Rorer
* Mr. C. L. Smith
* Mr. J. B. Connelley
* Mr. J. P. Mohr
* Mr. J. E. Casper
* Mr. J. A. Jones
* Mr. J. M. Ladd
* Mr. J. R. Nichols
* Mr. J. S. Rosen
* Mr. J. T. Sullivan
* Mr. J. W. Tamm
* Mr. J. Z. Smith

Ms. Clare Lindsey
Federal Election Commission
1325 K. Street
N.W. Washington, D.C. 20463

July 12, 1979

EA: MUR 954

Dear Ms. Lindsey:

This will confirm that I called to apprise you that the letter from Mr. Oldaker, dated July 3, 1979 has just been forwarded to my attention and that I will need some additional time to investigate the events so that I may prepare the response your agency has requested.

I look forward to hearing from you at your earliest convenience and thank you for your cooperation.

Very truly yours

Scott E. Mollen

SEM/vj

550/VJ

LIPSON, SULLIVAN, MOLLEN & LIAPAKIS, P.C.
100 CHURCH STREET • NEW YORK, N. Y. 10007

Ms. Clare Lindsay
Federal Election Commission
1325 K. Street, N.W.
Washington, D.C. 20463



JUL 13 PM 1:44

RECEIVED
FEDERAL ELECTION
COMMISSION

600400424

July 13, 1979

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

Att: Clare Lindsay

Dear Ms. Lindsay:

We are in receipt of your letter dated July 3, 1979 addressed to Mr. Julio Forcade in care of this Bank. In your letter, you assert that there was a violation of Federal Law for contributions made to the Friends of Hernan Badillo in March of 1977.

On July 10, I spoke with Mr. Ken Gross of the Commission and explained to him that the Bank was reimbursed by Mr. Forcade for these contributions in January, 1979. I also indicated that in the second paragraph of your letter, you indicate that "it is unlawful for a national bank to make a contribution in connection with a Federal election." I wish to point out to you that we are not a national bank but a state chartered bank in New York State. Be that as it may, Mr. Gross requested that I send copies of all documentation to you with an explanation so that you may assess the situation.

The following is a summary of documentation enclosed:

- Letter from Martin D. Fife referring to the contributions made in March, 1977 and notifying the Bank of steps to correct the situation.
- Letter from the undersigned to Mr. Forcade notifying him of Mr. Fife's letter and the reimbursement to the Bank.
- Credit ticket of January 31, 1979 indicating that the Bank was reimbursed via withholding the amount from Mr. Forcade's severance pay.

June 1, 1978.

Dear Mr. [illegible]:

Very truly yours,



P. J. Spadafino
Vice President, [illegible]

00040204426

MARTIN D. FIFE
180 MADISON AVENUE
NEW YORK, N. Y. 10017

January 11, 1978

United American Bank
30 Broadway
New York, New York 10004

Gentlemen: RE:- Your Expense Checks for \$100.00 and \$200.00,
received in connection with dinner for
The Honorable Herman Badillo
at the Essex House, March 18, 1977

The Federal Election Commission has informed us that you are
incorporated under the laws of New York State. I am required,
therefore, to refer to your contributions made by the subject
two checks.

Our records manifest only the following:- Expense check for \$100.00,
Julio Forcade attending, and deposited March 8, 1977; Expense check
for \$200.00, no individual specified, and deposited March 22, 1977.

The account to which these checks were deposited was FRIENDS OF
HERMAN BADILLO at Bankers Trust Company, the proceeds of which
account were used to retire debts incurred in Mr. Badillo's cam-
paign for reelection to the Congress of the United States.

If not previously aware that the funds were used relative to a
Federal election, will you then please arrange for the people who
attended the dinner to reimburse you for the value of the respective
checks.

I await your reply by official letter and apologize for this
inconvenience but it is essential to have your answer.

Yours truly,

Martin D. Fife

MDF:EGM

cc: The Honorable Herman Badillo
Deputy Mayor of New York
City Hall
New York, New York 10007

30040204427

January 17, 1979

Dr. Julio Forcade
444 East 82nd Street
New York, New York 10028

Dear Dr. Forcade:

We have received a letter from Mr. Martin Fife (copy attached) which indicates that in 1977, the Bank has made contributions to a candidate seeking a Federal office. A review of the Bank's records has disclosed that you had requested the payments be made for your attendance at the dinner (copies attached). Since it is illegal for a corporation to make such contributions, we have been advised to exercise our right of offset and are deducting \$300.00 from the next payment to be made to you on January 31, 1979 under the terms of your severance agreement.

If you have any questions regarding the above, please contact me at 269-9612.

Very truly yours,



Fred J. Spadafora
Vice President/Controller

FJS/emz
Enclosures

00040204428

100-1
New York, N. Y.

DATE 1-31-79

From 1-21-79 to 1-3-79

Loan: Reimbursement to U.A.B. (Mr. Badillo Buffet)

Julio Forcades
445 East 42 Street
New York, N. Y. 10018

100-1-0124

1-2-2216-6
ACCOUNT NUMBER

General Acct.

0122166

AMOUNT	
1,000.00	
(300.00)	
TOTAL	
700.00	

OFFICE COPY

30040201430

UNITED AMERICAS BANK

50 BROADWAY

NEW YORK, N. Y. 10004



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

79 JUL 18 PM 12:16

RECEIVED
FEDERAL ELECTION
COMMISSION



AFL-CIO, CLC
 150 Broadway, New York, N.Y. 10003
 (212) 512-2000
 770 Broadway, New York, New York 10003

RECEIVED
 FEDERAL BUREAU OF INVESTIGATION
 JUL 18 1979

79 JUL 18 PM 2:34
 July 13, 1979

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

903157

Re: Local 169, Amalgamated Clothing and
Textile Workers Union, AFL-CIO, CLC
MUR 954

Dear Ms. Lindsay:

This letter will confirm our phone conversation of this morning. During that conversation I informed you that Local 169 does not believe that it violated 2 USC 441b as alleged in Mr. Oldaker's letter of July 3, 1979.

As I told you this morning, I will be away from my office for the next two (2) weeks. Please be assured that I will send you a more detailed statement of our position when I return.

Thank you for your cooperation in this matter.

Very truly yours,

George A. Kirschenbaum

George A. Kirschenbaum
 Assistant General Counsel

cc: Kilmer Caban
 Sydney Bykofsky

GAK/lg

00040004471

84:44 017082

VICE PRESIDENTS
 SAMUEL J. AZZINARO
 OMA BARTON
 DENIS A. BLAIS
 DAVID CHANEY
 ABRAHAM CHATMAN
 CHARLES "BUO" CLARK
 DOROTHY CONGOS
 JOSEPH COPONI

JEAN-MARC COUTURE
 FRANK CUCCIO
 EMMA DAMERON
 WAYNE DERONCOURT
 WILLIAM ROGER DOVE
 HENRY DROPKIN
 BRUCE DUNTON
 CHARLES S. ENGLISH
 GEORGE FECTEAU
 SAM FOX

CARL E. FRAZIER
 CHARLES J. GARRAHAN
 HARRY GOLDSTEIN
 WILLIAM C. HALL
 DAVID T. HARRIS
 BILL HIMES
 SCOTT HOYMAN

HARRY LAUTMAN
 LEONARD LEVY
 RICHARD MacFADYEN
 MICHAEL J. MEROLA
 JOYCE D. MILLER
 VERA MILLER
 MURRAY MORENO
 FRANK NICHOLAS JR.
 SAM NOCELLA
 DIANA NUNES

VINCENT RICCIARDELLI
 CHARLES SALLIE
 LOUIS SIMON
 LEON SPITZER
 PAUL SWAITY
 PETER J. SWOBODA
 CECIL TOPPIN

300403014432

ANALOGATED CLOTHING AND TEXTILE WORKERS UNION



AFL-CIO, CLC

15 UNION SQUARE • NEW YORK, N.Y. 10003

412

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



'79 JUL 18 PM 2:54

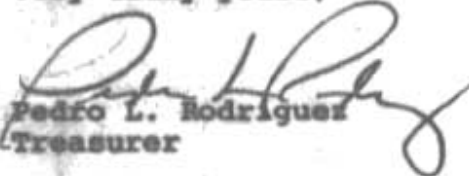
Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Dear Mr. Oldaker:

In light of the letter we received from the Federal Election Commission, dated July 3rd, 1979, which was received on July 10th, 1979, we find that the filing of the July 10th Report at this time will be impossible. There are issues that have been raised that might be confused by the filing of the July 10th Report.

We are therefore, requesting an extension of time for this filing, until after we answer the letter from the Federal Election Commission of July 3rd, 1979, Re: MUR 954.

Very truly yours,


Pedro L. Rodriguez
Treasurer

79 JUL 16 P 3: 59

RECEIVED
OFFICE OF THE
GENERAL COUNSEL

Committee for the Re-Election
of Congressman Herman Badillo
c/o Pedro L. Rodriguez
1414 Metropolitan Avenue
Bronx, New York 10462



RETURN RECEIPT REQUESTED

REGISTERED



Mr. William C. Oldaker
General Counsel
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463



FEDERAL ELECTION COMMISSION

1155 A STREET, N.W.
WASHINGTON, D.C. 20543

August 27, 1979

Joint Council No. 15,
International Brotherhood of Teamsters,
265 W. 14th St.,
New York, New York 10011

Re: NLR 954

Gentlemen:

This letter is to notify you that the Commission found reason to believe that Joint Council No. 15 made a \$200 labor union contribution to Friends of Herman Badillo in March, 1977 in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a labor organization to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20004

July 3, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nathan Katz
Pocketbook and Novelty Workers Union
149 5th Avenue
New York, N.Y. 10010

Claudia Boyin

212-736-7570

called 7/3

Re: MOR 954

Dear Mr. Katz:

This letter is to notify you that the Commission found reason to believe that the Pocketbook and Novelty Workers Union made a \$200 labor union contribution to Friends of Herman Badillo in March 1977 in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a labor organization to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

July 3, 1975

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

**Pedro L. Rodriguez, Treasurer
Committee for the Re-Election of
Congressman Herman Badillo
1414 Metropolitan Avenue
Bronx, New York 10462**

Re: NUR 954

Dear Mr. Rodriguez:

This letter is to notify you that the Commission has found reason to believe that the Committee for the Re-Election of Congressman Herman Badillo ("the Committee") violated: 2 U.S.C. § 432(d) by failing to retain supporting documentation for expenditures in excess of \$100; 2 U.S.C. § 434(b) (9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of designated campaign depository and by failing to maintain a record of petty cash disbursements; and 2 U.S.C. § 441b by accepting a contribution from a labor union. The Commission also found reason to believe that the Friends of Herman Badillo ("FOHB") accepted contributions in violation of 2 U.S.C. § 441b from four banking entities, three labor unions and five businesses.

Under 2 U.S.C. § 432(d), a political committee must obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100, and for any expenditure in a lesser amount if the aggregate amount of such expenditures to the same person during a calendar year exceeds \$100. During the course of auditing the Committee, the auditors noted cash expenditures totaling \$10,620.24 which were not documented as required under 2 U.S.C. § 432(d). Although the Committee subsequently submitted documentation for cash expenditures totaling \$2,447.59, this documentation could not be traced to particular expenditures because the dates and amounts of the reported expenditures did not correspond to the dates and amounts shown on the documentation.

Under 3 U.S.C. § 434(b) (9) and (10), reports filed with the Commission must identify the persons to whom expenditures aggregating in excess of \$100 are made. Expenditures in excess of \$100 may be made to "cash" however only to replenish the petty cash fund. (11 C.F.R. § 102.10) The Commission believes that the Committee made cash expenditures in excess of \$100 for reasons other than to replenish the petty cash fund and by failing to report the payees of these expenditures, (and) has violated 2 U.S.C. §§ 434(b) (9) and (10).

Under 2 U.S.C. § 437(a) a political committee is required to make all expenditures on behalf of a candidate or to influence his election by a check drawn on a designated campaign depository unless the expenditure is in the sum of \$100 or less and is taken from a petty cash fund. The auditors noted that the Committee made a great number of cash payments for what appeared to be large individual expenses such as paint, lumber, sound equipment, etc. The Commission believes that these individual expenditures exceeded \$100 and therefore should have been paid for by checks drawn on the designated accounts. Furthermore, the Committee failed to keep a record of petty cash disbursements as required under 2 U.S.C. § 437(b).

The Commission found reason to believe that the Committee violated 2 U.S.C. § 441b. This section prohibits political committees from accepting corporate, labor and national bank contributions. The Commission also found reason to believe that FOHB violated 2 U.S.C. § 441b by accepting corporate and national bank contributions. Please see the attached list for both committees.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

- 3 -

This letter and its contents shall remain confidential
except as may be required by 437916 (3) unless you advise
the Commission in writing that you wish the information
to be made public. The agent number assigned to this matter
is Carlo Lindsay, who can be reached at (202) 523-4240.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

U.S. MAIL
FIRST CLASS PERMIT NO. 1000 WASHINGTON, D.C. 20540

1. ADDRESSEE'S NAME AND ADDRESS
☐ Mr. ☐ Mrs. ☐ Miss ☐ Mr. ☐ Mrs. ☐ Miss ☐ Mr. ☐ Mrs. ☐ Miss

2. ARTICLE DESCRIPTION
REGISTERED NO. ☐ CERTIFIED NO. ☐ INSURED NO. ☐

3. NAME OF ADDRESSEE TO
Carlo Lindsay

4. DATE OF DELIVERY
7/19/78

5. ADDRESS
Carlo Lindsay

6. UNABLE TO DELIVER BECAUSE
CLERK'S INITIALS

DATE OF MAILING: MAY 1978

U.S. MAIL SERVICE

Prohibited Contributions Accepted by Committee for
Re-Election of Congressman Robert M. La Follette

Pocketbook and Novelty Workers Union \$100

Prohibited Contributions Accepted by the Friends of
Bernard Bafilio:

United American Bank \$100
\$200

Union Federal Savings & Loan Association of N.Y. \$100

Equitable Federal Savings and Loan Association
of N.Y. \$100

Banco Popular de Puerto Rico \$200

Pocketbook & Novelty Workers Union \$200

Joint Council No. 16 \$200

Washable Clothing, Sportswear & Novelty
Workers Union \$200

Castro-Blanco, Piscioneri, & Feder, P.C. \$300

El Barrio Chamber of Commerce \$50

NAC Realty Company \$200

I.G.C., P.C. \$100

Lipsig, Sullivan, Mollen and Liapakis, P.C. \$1,000



FEDERAL ELECTION COMMISSION

1325 K STREET, N.W.
WASHINGTON, D.C. 20543

July 3, 1979

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Kilmer Caban
Washable Clothing, Sportswear and
Novelty Workers Union
Local 169, A.C.N.A.
33 West 14th Street
New York, N.Y. 10011

Re: MUR 934

Dear Mr. Caban:

This letter is to notify you that the Commission found reason to believe that the Washable Clothing, Sportswear and Novelty Workers Union made a \$200 labor union contribution to Friends of Herman Badillo in March 1977 in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a labor organization to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

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

3 ARTICLE DESCRIPTION
 REGISTERED NO. CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

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

4 DATE OF DELIVERY
7/9/79

5 ADDRESS (Complete only if requested)

6 UNABLE TO DELIVER BECAUSE

POSTMARK
 JUL 9 1979
 CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1105 K STREET, N.W.
WASHINGTON, D.C. 20543

July 3, 1977

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nathan Katz
Pocketbook and Novelty Workers Union
149 5th Avenue
New York, N.Y. 10010

Re: MUR 954

Dear Mr. Katz:

This letter is to notify you that the Commission found reason to believe that the Pocketbook and Novelty Workers Union made a \$200 labor union contribution to Friends of Herman Badillo in March 1977 in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a labor organization to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

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:
Nathan Katz

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. INSURED NO.
(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY: *7/11/79* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nathan Katz
Pocketbook and Novelty Workers Union
149 5th Avenue
New York, N.Y. 10010

Re: MUR 954

Dear Mr. Katz:

This letter is to notify you that the Commission found reason to believe that the Pocketbook and Novelty Workers Union made a \$200 labor union contribution to Friends of Herman Badillo in March 1977 in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a labor organization to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

4 7/1/79
William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION
1234 M STREET, N.W.
WASHINGTON, D.C. 20543

July 3, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Julio Forcade
United American Bank
50 Broadway
New York, N.Y. 10004

Re: ME 934

Dear Mr. Forcade:

This letter is to notify you that the Commission has found reason to believe that the United American Bank made in March 1977, a \$100 and \$200 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a national bank to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

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

M 954

● 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:
Julio Forcade

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

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

61-608000
U.S. POSTAL SERVICE
JUL 10 1977
STATION 61-608000



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Julio Forcada
United American Bank
50 Broadway
New York, N.Y. 10004

Re: NUA 954

Dear Mr. Forcada:

This letter is to notify you that the Commission has found reason to believe that the United American Bank made, in March 1977, a \$100 and \$200 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a national bank to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

10
C 7/1/79

July 3, 1978

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Equitable Federal Savings and Loan Association
of New York
P.O. Box 1025
Brooklyn, N.Y. 11201

Re: MEK 934

Gentlemen:

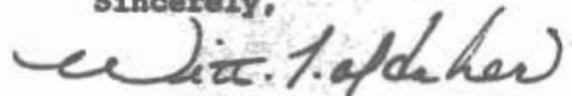
This letter is to notify you that the Commission has found reason to believe that the Equitable Federal Savings and Loan Association of New York made, in March 1977, a \$100 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a corporation to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,



William C. Oldaker
General Counsel

PS Form 3811, Apr. 1977

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

CL J 11956

● 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:
*Comptroller Federal & State
 Assn. of New York*

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

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY *110200*
AUG 14 1979 POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Equitable Federal Savings and Loan Association
of New York
P.O. Box 1025
Brooklyn, N.Y. 11201

Re: MUE 934

Gentlemen:

This letter is to notify you that the Commission has found reason to believe that the Equitable Federal Savings and Loan Association of New York made, in March 1977, a \$100 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a corporation to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

U.S. DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20543

July 3, 1978

**CERTIFIED MAIL
RETURN RECEIPT REQUEST**

Ramon Feliciano
Banco Popular de Puerto Rico
7 W. 51 Street
New York, N.Y. 10019

Re: MEA 934

Dear Mr. Feliciano:

This letter is to notify you that the Commission has found reason to believe that the Banco Popular de Puerto Rico made, in March 1977, a \$200 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a national bank to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel



RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

Show to whom, date, and address of delivery
(CONSULT POSTMASTER FOR FEES)

Ramon Feliciano

(All items obtained from this source are for the use of the addressee or agency)

RANED POPULAR

DATE OF DELIVERY: 10/15/56 POST MARK

5 ADDRESS(0)

6 UNABLE TO DELIVER BECAUSE:

CLERK'S
INITIALS



FEDERAL ELECTION COMMISSION

1335 K STREET, N.W.
WASHINGTON, D.C. 20541

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ramon Feliciano
Banco Popular de Puerto Rico
7 W. 51 Street
New York, N.Y. 10019

Re: MUR 954

Dear Mr. Feliciano:

This letter is to notify you that the Commission has found reason to believe that the Banco Popular de Puerto Rico made, in March 1977, a \$200 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a national bank to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

1101 K STREET, N.E.
WASHINGTON, D.C. 20003

July 3, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Vito, President
Union Federal Savings and Loan Association
of New York,
200 E. 23rd Street,
New York, N.Y. 10010

Re: NYC 955

Dear Mr. Vito:

This letter is to notify you that the Commission has found reason to believe that the Union Federal Savings and Loan Association of New York made, in March 1977, a \$100 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel



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

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● 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.
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☐ 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:
Charles Vite

3. ARTICLE DESCRIPTION:
 REGISTERED NO. *3 7476* CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

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

4. DATE OF DELIVERY *7/9/79* POSTMARK

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE: CLERK'S INITIALS



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.
WASHINGTON, D.C. 20542

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Vite, President
Union Federal Savings and Loan Association
of New York,
200 E. 23rd Street,
New York, N.Y. 10010

Re: NLR 954

Dear Mr. Vite:

This letter is to notify you that the Commission has found reason to believe that the Union Federal Savings and Loan Association of New York made, in March 1977, a \$100 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15/0 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

July 3, 1979

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Mr. David Castro-Blanco
Castro-Blanco, Piscioneeri
and Feder, P.C.
10 E. 39th Street
New York, New York 10016

Re: MUR 950

Dear Mr. Castro-Blanco:

This letter is to notify you that the Commission has found reason to believe that Castro-Blanco, Piscioneeri and Feder, P.C. made a corporate contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for any corporation to make a contribution in connection with a federal election.

The Commission has a copy of your letter, dated January 11, 1979, to Mr. Martin D. Fife explaining that the contribution in question was from "the principal[s'] private account and charged to the individuals." However, this letter does not explain whether these private accounts were reimbursable or non-reimbursable drawing accounts.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



1. The letter of notification shall remain confidential
in accordance with 1 U.S.C. § 437g(a)(3) unless you state
to the Commission in writing that you wish the investigation
to be made public. The staff member assigned to this matter
is Clara Lindsey, who can be reached at (202) 513-4040.

Sincerely,



William C. Oldaker
General Counsel

July 3, 1979

CONFIDENTIAL MAIL
NOTES: RECEIPT REQUIRED

NAC Realty Corporation
2341 Conner Street
Brooklyn, New York 10066

Re: NYN 934

Gentlemen:

This letter is to inform you that the Commission has found reason to believe NAC Realty Corporation made a corporate contribution in March 1977 to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a federal election.

We have reviewed a copy of your letter, dated November 15, 1978, to Martin Fire which states that NAC Realty Corporation is no longer incorporated. However, our check with the Secretary of State in New York reveals that NAC Realty Corporation is still active.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



Sincerely,

Sincerely,
 Maria F. Fisher

William C. Oldaker
General Counsel

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1. ARTICLE RECEIVED FROM _____

☐ RETURN TO SENDER
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☐ POSTAGE GUARANTEED
☐ REGISTERED MAIL

2. ARTICLE ACQUIRED BY _____
AAC Realty Corporation

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.

4. I have received the article described above.
☒ RECEIVED ☐ AUTHORIZED ☐ AUTHORIZED AGENT

OK R. B. ...

DATE OF DELIVERY
7-9-78

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2344 Crown St

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July 9, 1979

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Professor Yitzhak A. Seinfeld
Executive Vice-President
IGC, P.C.
919 Third Avenue
New York, New York 10022

Re: MUR 934

Dear Professor Seinfeld:

This letter is to inform you that the Commission has found reason to believe that I.G.C. made a corporate contribution in violation of 2 U.S.C. § 441b to the Friends of Herman Badillo.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a federal election.

We have reviewed a copy of your letter, dated November 27, 1978, to Martin Fife which states that the funds behind this contribution were from a source other than the corporation. Please explain the source of the funds and why this contribution was remitted through the corporation.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this letter is Clare Lindsay, who can be reached at (202) 523-4040.

Sincerely,

William C. Oldaker

William C. Oldaker
General Counsel

1. The following article is being delivered to you:

☐ Standard letter and return envelope
☐ Standard letter and return envelope with return address
☐ Standard letter and return envelope with return address and return postage
☐ Standard letter and return envelope with return address and return postage and return postage paid by addressee

2. ARTICLE ACCORDING TO:

Per your a. Serial

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
<i>348279</i>		

4. I have received the article described above.

☒ Registered ☐ Certified ☐ Insured

DATE OF DELIVERY

7-10-79

5. ACCORDING TO THE FOLLOWING:

919.5

6. UNABLE TO DELIVER BECAUSE:

CLERKS INITIALS



FEDERAL ELECTION COMMISSION
1100 K STREET, N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

July 5, 1979

Mr. Scott E. Mollen
Lipsig, Sullivan, Mollen and
Liapakis, P.C.
100 Church Street
New York, New York 10007

Re: NLR 954

Dear Mr. Mollen:

This letter is to notify you that the Commission has found reason to believe that Lipsig, Sullivan, Mollen, and Liapakis, P.C., made a corporate contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a federal election.

We have reviewed a copy of your letter, dated January 19, 1979, to Martin D. Pife which states the allocation of the \$1,000 contribution. Please explain why this contribution was remitted through a corporate check.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 10 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the information to be made public. The staff member assigned to this letter is Mike Lindsey, who can be reached at (202) 523-6880.

Sincerely,



William C. Oldaker
General Counsel

1. The following article is the subject of this notice:		
☐ Give to whom and how delivered	_____	_____
☐ Show to whom date and method of delivery	_____	_____
☐ RESTRICTED DELIVERY	_____	_____
☐ RESTRICTED DELIVERY	_____	_____
☐ RESTRICTED DELIVERY	_____	_____
2. ARTICLE ADDRESS TO:		
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3. ARTICLE DESCRIPTION		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.
<i>By 1/80</i>		
I have received the article described above.		
SIGNATURE	☐ Addressee	☐ Authorized agent
<i>Sally B. Case</i>		
4. ADDRESS		
5. UNABLE TO DELIVER BECAUSE:		
CLERK'S INITIALS		

In the matter of)
)
Committee for the Re-Election)
of Congressman Herman Badillo)
et al.)

MR 954

CONCLUSION

1. Marjorie W. Evans, Secretary to the Federal Election Commission, certify that on June 20, 1979, the Commission, meeting in an executive session, determined by votes of 6-0 to take the following actions in MR 954:

1. Find reason to believe that the Committee for the Re-Election of Congressman Herman Badillo violated: 2 U.S.C. §432(d) for failure to retain supporting documentation for expenditures; 2 U.S.C. §434(b) (9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. §437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements; and 2 U.S.C. §441b by accepting labor union contributions from the Pocketbook and Novelty Workers Union.
2. Find reason to believe that the Friends of Herman Badillo violated 2 U.S.C. §441b by accepting contributions from the Pocketbook and Novelty Workers Union, Joint Council No. 16 International Brotherhood of Teamsters, and the Washable Clothing, Sportswear and Novelty Workers Local 169 Amalgamated Clothing Workers, United American Bank, Union Federal Savings and Loan Association of New York, Equitable Federal Savings and Loan Association of New York, Banco Popular de Puerto Rico, Castro-Blanco, Piscioneri and Feder, P.C., NAC Realty Company, IGC, P.C., and Lipsig, Sullivan, Mollen and Liapakis, P.C. and the El Barrio Chamber of Commerce.

CONTINUED

Certification for WBR 954
June 20, 1979

3. Find reason to believe that the Pocketbook and Novelty Workers Union violated 2 U.S.C. §441b by contributing to the Committee for the Re-Election of Congressman Herman Badillo.
4. Find reason to believe that the Pocketbook and Novelty Workers Union; Joint Council No. 26 International Brotherhood of Teamsters; the Washable Clothing, Sportswear and Novelty Workers Local 169 Allied Clothing Workers; United American Bank; Union Federal Savings and Loan Association of New York; Equitable Federal Savings and Loan Association of New York; Banco Popular de Puerto Rico; Castro Blanco, Placencia and Feder, P. C.; NAC Realty Company; IGC, P.C.; and Lipsig, Sullivan, Mollen and Liapakis, P.C. violated 2 U.S.C. §441b by contributing to the Friends of Herman Badillo.

Attest:

6/28/79

Date

Marjorie W. Emerson

Marjorie W. Emerson
Secretary to the Commission

8004029472

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20543

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS *MWE*
DATE: JUNE 19, 1979
SUBJECT: MUR 954 - First General Counsel's Report dated
6-18-79; Received in OCS 6-18-79, 12:30
OBJECTION

The above-named document was circulated on a 48
hour vote basis at 4:00, June 18, 1979.

Commissioner Harris submitted an objection at 11:13,
June 19, 1979, thereby placing MUR 954 on the Amended
Agenda for June 20, 1979.

A copy of Commissioner Harris' vote sheet with
comments is attached.

ATTACHMENT:
Copy of Vote Sheet

00040204473

Date and Time Transmitted: 5-18-79 4:00

Commissioners TRINDERSON, ADEENS, TIERMAN, McHARRY, THOMPSON, HARRIS

RETURN TO OFFICE OF COMMISSION SECRETARY BY: JUNE 20, 1979, 4:00

FILE No. 954 - First General Counsel's Report dated 5-18-79

☐ I approve the recommendation

☒ I object to the recommendation

COMMENTS: The recommendation re local 888
seem questionable.

Date: 6-19-79 Signature: Thomas E. Harris

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



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

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION JUN 18 1979

RECEIVED
OFFICE OF
COMMISSIONER
79 JUN 18 12:30
MUR # 954
DATE RECEIVED
BY OGC

STAFF MEMBER LINDSAY

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Committee for the Re-Election of Congressman Herman Badillo
Friends of Herman Badillo, Local 888-Retail Clerks Union,
Joint Council No. 16, Pocketbook and Novelty Workers Union,
Washable Clothing, Sportswear and Novelty Workers, United
American Bank, Union Federal Savings & Loan, Equitable
Federal Savings & Loan, Banco Popular de Puerto Rico,
Castro-Blanco, Piscioneri and Feder, P.C., NAC Realty Co.,
IGC, P.C., Lipsig, Sullivan, Mollen and Liapakis, P.C.
RELEVANT STATUTE: 2 U.S.C. §§ 432(d), 434(b)(9) and (10), 437b(e) and (b)
2 U.S.C. § 441b, 11 C.F.R. § 102.10 and 103.3

INTERNAL REPORTS CHECKED: Audit Findings

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

This matter was referred to the Office of General Counsel as a result of the Audit Division's findings during the audits of the Committee for the Re-Election of Congressman Herman Badillo and the Friends of Herman Badillo.

SUMMARY OF ALLEGATIONS

That the Committee for the Re-Election of Congressman Herman Badillo, ("the Committee") violated: 2 U.S.C. § 432(d) by failing to retain supporting documentation for expenditures in excess of \$100; 2 U.S.C. § 434(b)(9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through use of a designated campaign depository and by not maintaining a record of petty cash disbursements; and 2 U.S.C. § 441b by accepting contributions from 2 labor unions. That the Friends of Herman Badillo ("FOHB") accepted contributions from five corporations, four banks and three unions in violation of 2 U.S.C. § 441b. That Local 888-Retail Clerks Union, Joint Council No. 16, Pocketbook and Novelty Workers Union, Washable Clothing, Sportswear and Novelty Workers, United American Bank, Union Federal Savings and Loan of New York, Equitable Federal Savings and Loan of New York, Banco Popular de Puerto Rico, Castro-Blanco, Piscioneri and Feder, P.C., NAC Realty Co., IGC, P.C., Lipsig, Sullivan, Mollen and Liapakis, P.C. violated 2 U.S.C. § 441b by making contributions in connection with a Federal election.

- 1 -

PRELIMINARY LEGAL ANALYSIS

Cash Expenditures

During the audit of the Committee for the Re-Election of Congressman Herman Badillo ("the Committee"), the auditors noted that the Committee issued 67 checks payable to cash totaling \$10,620.24 and maintained no formal petty cash system. Of the 67 checks payable to cash, 21 were for amounts in excess of \$100 ranging from \$110 to \$1,500. The checks written to cash in excess of \$100 totalled \$7,579.24. 1/

The Audit Division requested that the Committee supply supporting documentation showing the ultimate payee of all the cash expenditures (\$10,620.24), including those of less than \$100 so that it could be determined which expenditures could require itemization. As a result of this request, the Committee submitted 130 documents for cash expenditures totaling \$2,447.59; however, this documentation could not be traced to particular cash expenditures because the dates and amounts shown on the documentation did not correspond to the dates and amounts of the reported expenditures.

2 U.S.C. § 434(b) (9) and (10) require that reports filed with the Commission identify the persons to whom expenditures aggregating in excess of \$100 are made as well as the purpose of the expenditures. Although the Committee did report the purposes of its cash expenditures for such uses as election day expenses, food for volunteers, office supplies and postage etc., no payee was named in violation of 2 U.S.C. § 434(b) (9) and (10).

2 U.S.C. § 437b(a), together with 11 CFR § 103.3, require that all expenditures made by a committee on behalf of a candidate or to influence his election must be made by check drawn on a designated campaign depository unless the expenditure is in the sum of \$100 or less and is taken from a petty cash fund. Further, a check made payable to "cash" shall not be made in excess of \$100 except to replenish a petty cash fund. 2 U.S.C. § 437b(b) and 11 CFR 102.10 provide that political committees may maintain petty cash funds from which expenditures not in excess of \$100 can be made in connection with a single transaction or purchase. When keeping a petty cash fund, the Committee treasurer is required to maintain a written journal of all disbursements, including the particulars of each such payment.

In this case, a great number of cash payments were made for campaign workers and refreshments as well as larger individual expenses such as sound equipment, lumber, paint, etc. (See Attachment).

1/ All of these expenditures were itemized on amended reports with the payee disclosed as "cash."

While salaries and refreshments for campaign workers seem to be typical petty cash expenditures, other expenses, such as paint and lumber suggest the likelihood that individual outlays in excess of \$100 were made. These disbursements would have been made in violation of 2 U.S.C. § 437b(a), having not been made by check on a campaign depository. In addition, no petty cash journal was maintained although such is required by 2 U.S.C. § 437b(b) and 11 C.F.R. § 102.10.

2 U.S.C. § 432(d) requires the retention of receipted bills, giving "particulars" for all expenditures in excess of \$100 or aggregating in excess of \$100 to the same person. While the Committee has submitted \$2,447.59 in documentation for cash expenditures out of a total of \$10,620.24, this documentation does not correspond to reported expenditures to "cash" and therefore does not unquestionably demonstrate the actual use of the monies. However, if this documentation were to be accepted by the Commission, there would still remain \$8,172.65 in expenditures neither accounted for in a petty cash journal nor documented as required under 2 U.S.C. § 432(d), if over \$100.

Prohibited Contributions

The Committee has acknowledged acceptance of a \$100 labor union contribution from the Pocketbook and Novelty Workers Union. This contribution has not yet been refunded however is being reported as a debt until the Committee can make a refund. The Committee also accepted a \$100 contribution from Local 888-Retail Clerks Union which does not have a registered political action committee.

The Friends of Herman Badillo accepted contributions totaling \$1650 from five entities verified as incorporated.^{1/} FOHB has submitted documentation for these contributions which is intended to demonstrate that these contributions are permissible, however the Office of General Counsel does not believe that the documentation is satisfactory. FOHB has acknowledged acceptance of contributions totaling \$700 from 4 banks and contributions totaling \$600 from 3 labor unions.^{2/}

We recommend that the Commission find reason to believe that the Committee and FOHB violated 2 U.S.C. § 441b and reason to believe that four incorporated entities, four labor unions and four banks also violated 2 U.S.C. § 441b by contributing to these committees.

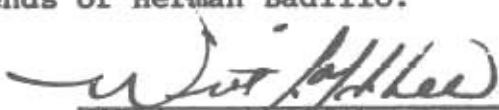
^{1/} One of the incorporated contributors contributed \$50 and so does not meet the threshold for becoming a respondent.

^{2/} The Committee is disclosing these contributions as debts on its reports since the FOHB is no longer in existence.

Recommendations

1. Find reason to believe that the Committee for the Re-Election of Congressman Herman Badillo violated: 2 U.S.C. § 432(d) for failure to retain supporting documentation for expenditures; 2 U.S.C. § 434(b) (9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. § 437b(a) and (b) by making expenditures for non-petty cash purposes by means other than through the use of a campaign depository and by not maintaining a record of petty cash disbursements; and 2 U.S.C. § 441b by accepting labor union contributions from Local 888- Retail Clerks Union and the Pocketbook and Novelty Workers Union.
2. Find reason to believe that the Friends of Herman Badillo violated 2 U.S.C. § 441b by accepting contributions from the Pocketbook and Novelty Workers Union, Joint Council No. 16 and the Washable Clothing, Sportswear and Novelty Workers, United American Bank, Union Federal Savings and Loan Association of New York, Equitable Federal Savings and Loan Association of New York, Banco Popular de Puerto Rico, Castro-Blanco, Piscioneri and Feder, P.C., NAC Realty Company, IGC, P.C., and Lipsig, Sullivan, Mollen and Liapakis, P.C. and the El Barrio Chamber of Commerce.
3. Find reason to believe that Local 888-Retail Clerks Union and the Pocketbook and Novelty Workers Union violated 2 U.S.C. § 441b by contributing to the Committee for the Re-Election of Congressman Herman Badillo.
4. Find reason to believe that the Pocketbook and Novelty Workers Union, Joint Council No. 16, the Washable Clothing, Sportswear and Novelty Workers, United American Bank, Union Federal Savings and Loan Association of New York, Equitable Federal Savings and Loan Association of New York, Banco Popular de Puerto Rico, Castro Blanco, Piscioneri and Feder, P.C., NAC Realty Company, IGC, P.C., and Lipsig, Sullivan, Mollen and Liapakis, P.C. violated 2 U.S.C. § 441b by contributing to the Friends of Herman Badillo.

6/14/79
Date


William C. Oldaker
General Counsel

Attachments

Copies of Committee expenditure reports
Audit Referral
13 letters

30040204479

0007010142438202 39

Committee for the Re-election of Congressman Norman Mailer			
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each expenditure this period
Cash	Feed for poll watchers Transportation for poll watchers.	9/14/76	268.00
Cash	Distribution of Palm cards & literature	9/14/76	158.00
Cash	rental for the headquarters at: 1068 Ward Ave. Bronx, N.Y.	9/14/76	325.00
Cash	Rental for the headquarters at: 589 So. Blvd.	9/14/76	275.00
Cash	Rental for the headquarters at: 713 E. 175th St. Bronx, N.Y.	9/14/76	250.00
Cash	Victory Party at main headquarters	9/14/76	458.00
Cash	Rental of sound equipment	9/14/76	325.00
Cash	Petty cash for miscellaneous items	9/14/76	91.00
Subtotal of expenditures this page (optional)			2150.00
Total this period (last page this line number only)			8

U.S. GOVERNMENT
PRINTING OFFICE
1965 O-344-000

COMMITTEE FOR THE ABOLITION OF CONSCRIPTION HELPS MAINTAIN
CASH, EXPENSES, AND INDEMNITY
FOR MONTHS 21, 22, AND/OR 23 OF 1967 FORM 3
(See Instructions on back)

Page _____ of _____
Name _____
Address _____
City _____ State _____ Zip _____

COMMITTEE FOR THE ABOLITION OF CONSCRIPTION HELPS MAINTAIN

Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each item this period
Cash	Paint for headquarters Painting equipment, door for back room	7/20/76	\$200.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each item this period
Esme Stephens 34-12 113th Street Corona, New York	Reimbursement for expenses, gas, food for volunteers	7/20/76	60.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each item this period
Jose Rosa 1255 Evergreen Avenue Bronx, N.Y.	For pictures taken	7/22/76	15.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each item this period
Bolivar Arrelano 181 Hudson Street New York, N.Y.	Photographs	7/23/76	30.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each item this period
Cash XXXXXXXXXXXX	For Bronx County Clerk (refused to accept check) for index number for petition operation	7/27/76	75.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each item this period
B.T. Credit Corp. 1775 Broadway N.Y. N.Y.	Travel Expenses	7/27/76	396.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each item this period
Cash	Service of subpoenas	7/27/76	50.00
Full Name, mailing address and ZIP code	Purpose of Expenditure	Date (month, day, year)	Amount of each item this period
Jose Hernandez 235 West 103rd St N.Y. N.Y. 10025	Distribution of Literature & 2 Police permits	7/28/76	40.00
Subtotal of expenditures this page (optional)			\$ 266.00
Total this period (last page this line number only)			\$ -

000478642212



FEDERAL ELECTION COMMISSION

1125 K STREET N.W.
WASHINGTON, D.C. 20543

April 12, 1979

MEMORANDUM

TO : BILL OLDAKER

THROUGH : ORLANDO B. FOTTER *AP*
STAFF DIRECTOR

FROM : *AC* BOB COSTA, RAY LISI *EL*

SUBJECT : AUDIT OF THE COMMITTEE FOR THE RE ELECTION
OF CONGRESSMAN HERMAN BADILLO ("THE COMMITTEE")
AND FRIENDS OF HERMAN BADILLO ("FOHB")

During the audit of the above committees the following matters were noted which are being referred to your office for possible MUR treatment.

Attachments as stated



3004020483

A. Separation of Campaign Organizations

Section 110.8(d)(1) and (2) of Title 11, Code of Federal Regulations states, in part, that if an individual is a candidate for a Federal office and a state office he must designate separate principal campaign committees and establish completely separate campaign organizations, and that no funds may be transferred between or used by the separate campaigns, except as provided in Section 110.3(a)(2)(iv).

On May 14, 1976, the Committee held a fundraising dinner grossing approximately \$22,074.50. The receipts from the fundraiser were deposited into an account maintained for the Candidate when he was a candidate for the Office of Mayor of New York City entitled "New Yorkers for Badillo" (NYFB). Both accounts were maintained at Bankers Trust Company, a depository disclosed on the Congressional Committee's statement of organization.

The NYFB account had a balance of \$100.00 at the time the fundraising receipts were deposited. Expenditures relating to the fundraiser and other operating expenses relating to the Committee were paid from the NYFB account. The net proceeds were subsequently transferred to the Congressional campaign account. Based upon the reconciliations performed during the audit, it has been determined that all receipts and expenditures relating to the fundraiser were reported on the Committee's reports.

In addition, as mentioned above, the NYFB account had a balance of \$100 when the fundraising proceeds were deposited. During 1975, the NYFB account received \$3,050.00 from business entities which were verified by the N.Y. Secretary of States office to be registered corporations. During the period the fundraising receipts were on deposit in the NYFB account, refunds totaling \$6,823.25 were also deposited into the account. This deposit represented refunds for taxes previously paid during the Candidate's mayoral race. A portion of the refunds were subsequently expended to pay outstanding mayoral debts with the residual transferred to the Candidates Congressional District Office special account.

It is the opinion of the Audit staff that the Candidate has violated Section 110.8(d)(1) and (2) of Title 11, Code of Federal Regulations by not maintaining separate accounts for separate campaigns. However, since the Committee, as a result of subsequent amendments filed, has reported all the federally related activity from the account and has been advised of the requirements of Section 110.8(1) & (2), we recommend no further action on this matter.

B. Cash Expenditures in Excess of \$100

Section 102.10 of Title 11, Code of Federal Regulations states, in part, that a committee may maintain a petty cash fund out of which it may make expenditures not in excess of \$100 to any person in connection with a single purchase or transaction. A check made payable to "cash" shall not be made in excess of \$100 except to replenish a petty cash fund.

The Committee issued a total of 67 checks payable to cash, totaling \$10,620.24. Additionally, the Committee did not maintain a formal petty cash system.

A review of the Committee's expenditure records revealed that 21 of the checks payable to cash were in excess of \$100. The checks ranged from \$110 to \$1,500, and totaled \$7,579.24. Two (2) of the checks (\$1,500 and \$994.24), were drawn on the NYFB account mentioned in A above.

Eighteen of the expenditures were itemized on the Committee reports, with the payee disclosed as "cash". Three (3) of the expenditures, \$1,000, \$1,500 and \$994.24 on September 13, 14 and 27, 1976 respectively, were not reported. However, the Committee reported eight (8) expenditures to cash, totaling \$2,150 on September 14, 1976, ^{1/} which were not supported with cancelled checks. It is our opinion that the eight (8) expenditures were made with the cash obtained from the checks for \$1,000 and \$1,500 written on September 13 and 14 respectively.

The Audit Division recommended in its audit letter that the Committee supply supporting documentation for all of the cash expenditures (including those less than \$100) in order to determine which ones require itemization and also recommended that the Committee amend its reports to include the unreported expenditures.

On February 16, 1979, the Committee filed an amendment itemizing the three (3) cash expenditures (\$1,000, \$1,500 and \$994.24) and deleting the eight (8) erroneously reported cash expenditures.

^{1/} The eight (8) reported expenditures are not included in the 67 checks payable to cash.

Additionally, the Committee submitted 130 documents for cash expenditures, totaling \$2,447.59. However, as noted above, the Committee reported the payee as cash for all cash expenditures. The documentation submitted could not be identified to any particular cash expenditure, as the dates and amounts of the documentation submitted do not correspond to the dates and amounts of the cash expenditures reported.

It is the opinion of the Audit staff that the Committee has violated Section 102.10 of the Commission's Regulations by making cash expenditures in excess of \$100 for reasons other than to reimburse the petty cash fund and Section 432(d) of Title 2 by not maintaining supporting documentation for the above expenditures.

C. Prohibited Contributions

Section 441b of Title 2 of the United States Code states, in part, that it is unlawful for any national bank, corporation or any labor organization to make a contribution or expenditure in connection with any Federal election.

1. Committee For the Re-Election of Congressman Herman Badillo

A review of the Committee's contribution records disclosed that the Committee received a \$1,000 contribution from a business entity, which had been verified to be incorporated at the time the contribution was made. In addition, three (3) contributions totaling \$700 were received from apparent labor unions.

In our letter, dated November 21, 1978, we recommended that the Committee refund the prohibited contributions and provide evidence of such refunds, or provide documentation that the contributions were not funded through prohibited sources.

On January 29, 1979, the Committee submitted documentation indicating that the one (1) corporate contribution represented personal funds, being held in trust, for the contributor (See Attachment A, response accepted) and that two (2) of the apparent labor union contributions, totaling \$600, were made from accounts representing voluntary contributions (See Attachments B & C, responses accepted). Additionally, the Committee has conditionally acknowledged a \$100 contribution, received from a labor union, to have been made from prohibited sources.

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-4-

The Committee terminated reporting to the Commission on November 21, 1977 (covering the period 6/30/77-9/30/77), but as a result of the audit additional amendments and disclosure reports were filed. On March 26, 1979, the Committee filed an additional amendment to disclose the prohibited contribution on Schedule C, as a debt owed by the Committee until a refund can be made.

2. Friends of Herman Badillo (FOHB)

During the course of the audit, it was determined that the FOHB received 11 contributions, totaling \$2,450, from six (6) businesses and four (4) banking entities which were verified to be incorporated at the time the contributions were made. Additionally, three (3) contributions, totaling \$600, were received from apparent labor unions.

In our letter, dated November 21, 1978, the Audit staff recommended that the FOHB refund the contributions, and submit evidence of such refunds, or provide documentation that the contributions were not funded through prohibited sources.

Since the FOHB was an authorized committee, and has terminated reporting with the Commission, the Audit staff verbally recommended that the principal campaign committee ("the Committee") refund the contributions which were determined to be prohibited. On February 16, 1979, the Committee disclosed on its Schedule C as debts owed, five (5) contributions from four (4) incorporated banking entities, totaling \$700. In a subsequent amendment filed on March 26, 1979, the Committee disclosed, as debts owed, three (3) labor union contributions, totaling \$600, thereby assuming the responsibility of refunding the prohibited contributions received by the FOHB.

Additionally, the FOHB submitted documentation for the contributions received from the remaining six (6) business entities. However, only two (2) responses were accepted as substantiating the permissibility of the accounts from which the contributions were funded (See Attachments D and E). The responses received from the remaining four (4) entities, in our opinion, are not acceptable as evidence that the contributions were funded through permissible sources (See Attachments F, G, H and I).

It is our opinion that the Committee For the Re-Election of Congressman Herman Badillo, the PCC, and the Friends of Herman Badillo have violated Section 441b(a) of Title 2 by accepting both labor union and corporate contributions.

November 20, 1978

Mr. Martin D. Fife
180 Madison Avenue
New York, New York 10016

Dear Marty:

In reply to your letter of November 14th concerning the \$1,000 check to New Yorkers for Sadillo, please be advised that The Clark Estates, Inc. check was an agent check.

The check represented a contribution for Mrs. Anne L. Peretz with funds being held for her account by The Clark Estates, Inc. No part of the check represented funds of the Corporation.

I hope this will give you the required information. Do not hesitate to contact me if you have further needs.

Best personal regards.

Sincerely yours,

Edward W. Stack
Secretary

FWS:vib

12/7/78...Foto to Miss Shirley Remeneski (B7M)

P23

Local 888
Retail Clerks Union
229 Park Avenue South
New York, New York 10003

Dear Sir:

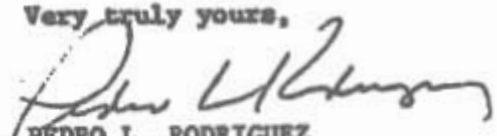
We have been advised by the Federal Election Commission that your Organization made a contribution of \$ 100.00 on 5-14-76 to the Committee For the Re-election of Congressman Herman Badillo.

Can you advise us whether said contribution came from an official political fund-raising arm of your Union, registered with the Federal Election Commission. If not, can you advise us from what source these funds came.

We have enclosed for your convenience, a stamped, self-addressed envelope.

Thank you for your immediate attention to this matter.

Very truly yours,


PEDRO L. RODRIGUEZ
Treasurer

Contribution came from the Active Ballot Club which is the political fund-raising arm of Local 888.

P25

R. Bouke

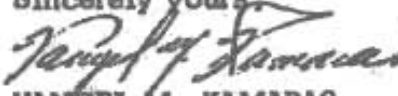
January 26, 1970

Mr. Pedro L. Rodriguez, Treasurer
Committee for the Re-election of Congressman
Herman Badillo
1414 Metropolitan Avenue
Bronx, N.Y. 10452

Dear Mr. Rodriguez:

Please be advised that the Local 6 Political
Action Fund is not registered with the Federal Election
Commission. Our contribution of \$500.00 was raised through
a voluntary contribution from our membership. These funds
are separate and apart from the union operation.

Sincerely yours,


VANGEL M. KAMARAS
President, Local 6

CF:at
opeiu/153

6

CASTRO-BLANCO
PISCIONERI &
FEDER
102 30 ST. N.Y. 10016

January 11, 1978

Mr. Martin D. Fife
180 Madison Avenue
New York, New York 10016

Dear Mr. Fife:

Sorry about the delay. Please be advised that the funds behind
the contribution made by us on March 18, 1977, Check #2333, to
the order of Martin Fife, Chairman, were from the principals
private account and charged to the individuals.

Very truly yours,

CASTRO-BLANCO, PISCIONERI & FEDER, P.C.



David Castro-Blanco

/nb

Photocopy this letter to FEC, Washington DC
w/photocopies letters 11/9/78 & 12/13/78 of Martin D. Fife

TELEPHONE
New York 981-4300

TELETYPE
New York 981-4300

November 18, 1978

Mr. Martin D. Fife
180 Madison Avenue
New York, New York 10016

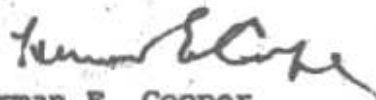
Dear Mr. Fife:

I am responding to your letter of November 9, which has just reached me. While the check for \$100.00 was drawn against Herman E. Cooper, P.C. account, it was charged to me personally as are other drawings representing compensation.

I hope that the foregoing will meet the contribution problems. If not, let me know what else it might require.

Best wishes.

Yours truly,



Herman E. Cooper

HEC/lm

PHOTOCOPY TO FEC, WASHINGTON, D. C.
w/photocopy ltr. 11/9/78 of Martin D. Fife

3004020419



Chamber of Commerce

1445 Lexington Avenue, New York, N. Y. 10017 • Tel. 866-1444

PRESIDENT
 GILBERTO RUIZ
 FIRST VICE PRESIDENT
 ANITA SOTO
 SECOND VICE PRESIDENT
 ANDRÉS DE LEÓN
 THIRD VICE PRESIDENT
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 STEVE MORINO
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 ROBERTO RODRIGUEZ
 HECTOR MINUTILLO
 RODRIGO RODRIGUEZ
 ALTERNATE MEMBER
 CEBTUDES ESCARFULLERY

LOUIS A. MALAVE
 Executive Director

December 14, 1978

Mr. Martin D. Fife
 180 Madison Avenue
 New York, N. Y. 10016

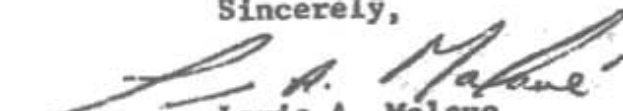
Dear Mr. Fife:

In reply to your letter of November 10, 1978 regarding a \$50 check drawn on the El Barrio Chamber of Commerce account and payable to Belen Denis in connection with the dinner for the Honorable Herman Badillo at the Essex House, March 18, 1977, please be advised that this represented a personal donation from one of our members and it was rendered through our account.

I apologize for my delay in replying to your letter and for any inconvenience it may have caused.

I take this opportunity to wish you and yours a Merry Christmas and a prosperous New Year.

Sincerely,


 Louis A. Malave
 Executive Director

LAM/mtv

cc: The Hon. Herman Badillo
 Deputy Mayor of New York
 City Hall
 Mr. Gilberto Ruiz, Pres.
 El Barrio Chamber of Commerce

PHOTOCOPY TO FEC, WASHINGTON D. C.
 w/photocopies ltrs. 11/10/78 & 12/12/78 of Martin D. Fife

MEMORANDUM FOR: DIRECTOR, FBI, WASHINGTON, D. C.
(please see notation below)

November 10, 1978

NAC Realty Co.
2241 Corner Street
Bronx, New York 10465

Gentlemen RE:- Your check for \$200.00, received
in connection with the dinner for
The Honorable Herman Badillo
at the Essex House, March 18, 1977

The Federal Election Commission has informed me that you are
incorporated under the laws of New York State. I am required,
therefore, to refer to your contribution made by the subject
check.

Can you state that the particular funds behind this contribu-
tion were from a source other than the corporation regardless
of the fact that contribution was remitted by means of your
corporate check.

The check was deposited to the account of FRIENDS OF HERMAN
BADILLO, the proceeds of which account were used to retire
debts incurred in Mr. Badillo's campaign for reelection to
the Congress of the United States.

I await your reply and apologize for any inconvenience but
it is essential to have your answer.

Yours truly,

MEF:EGM

Martin D. Fife

cc: The Honorable Herman Badillo
Deputy Mayor of New York
City Hall
New York, New York 10007

11/15/78...Marty:- Richard Nacliero phoned (on your red phone, so I guess he had that #
from years gone by) to say that FORMERLY it was NAC Realty Corp. but
that 2 or 3 years ago changed to NAC realty Co.. Therefore, that \$200.00
check for 1977 dinner was in order and that he wanted Herman Badillo to
know everything above board and also if he needs him, just to call.
(FEC had learned NAC was incorporated in December 1971. I guess FEC was not told
that it ~~was~~ became "unincorporated.")

EGM

00040204493

THE OFFICE
812 THIRD AVENUE

November 27, 1978

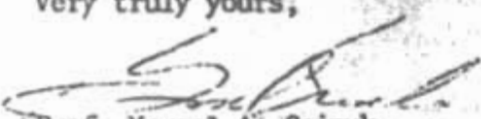
Mr. Martin D. Fife
180 Madison Avenue
New York, New York 10021

Dear Mr. Fife:

We are in receipt of your letter of November 10, 1978 relative to the \$100.00 contribution made in honor of the Honorable Herman Radillo.

Please be advised that the funds behind this contribution were from a source other than the corporation, despite the fact that this check was remitted through the corporation.

Very truly yours,



Prof. Ysrael A. Seinuk
Exec. Vice President

YAS:iv

PHOTOCOPY TO FEC, WASHINGTON, D. C.

w/photocopy ltr. 11/10/78 of Martin D. Fife

HARRY H. LIPSIG
ROBERT G. SULLIVAN
SCOTT E. MOLLEN
PAMELA A. LIAPAKIS
JAY W. DANKNER

CHARLES R. KENNEDY
ARTHUR W. STEIN
JOEL S. KENNEDY
FRANK J. KENNEDY
MICHAEL M. BLANK
MARTIN S. LEONARD
WILLIAM PRICE
ALAN S. LEONARD
STEVEN L. KENNEDY
MARVYN S. KENNEDY
EDWARD F. KENNEDY
PAUL SINGMASTER
MORTON S. KENNEDY
DAVID H. LEE
JACK D. KENNEDY
THOMAS KENNEDY
A. PAUL KENNEDY
NEIL F. SCHNEPPLES
BENNETT J. KENNEDY
HOWARD H. KENNEDY
WILLIAM ALAN APPEL
JAMES ANDRES
MARTIN A. STENZEL

*NEWSPER NEW YORK AND PHOENIX 400
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NEWSPER NEW YORK AND PHOENIX 400

January 19, 1979

Martin D. Fife, Esq.
180 Madison Avenue
New York, N.Y. 10016

Att: Ms. Elaine Mountain

Dear Ms. Mountain:

Please be advised that the allocation
of the check sent you in the amount of \$1,000.00
for the Herman Badillo Dinner is as follows:

Harry H. Lipsig	\$200.00
Robert G. Sullivan	200.00
Scott E. Mollen	200.00
Pamela A. Liapakis	200.00
Jay W. Dankner	200.00

Very truly yours,

SCOTT E. MOLLEN

SEM/mt

Photocopy to FEC, Washington, D. C.
w/photocopy ltr. 11/9/78 of Martin D. Fife

00040304495



FEDERAL ELECTION COMMISSION

1325 K STREET N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Pedro L. Rodriguez, Treasurer
Committee for the Re-Election of
Congressman Herman Badillo
1414 Metropolitan Avenue
Bronx, New York 10462

Re: MOR 954

Dear Mr. Rodriguez:

This letter is to notify you that the Commission has found reason to believe that the Committee for the Re-Election of Congressman Herman Badillo ("the Committee") violated 2 U.S.C. § 432(d) by failing to retain supporting documentation for expenditures in excess of \$100; 2 U.S.C. § 434(b) (9) and (10) by failing to report payees for expenditures in excess of \$100; 2 U.S.C. § 437b(a); and (b) by making expenditures for non-petty cash purposes by means other than through use of a designated campaign depository and by failing to maintain a record of petty cash disbursements; and 2 U.S.C. § 441b by accepting contributions from two labor unions. The Commission also found reason to believe that the Friends of Herman Badillo ("FOHB") accepted contributions in violation of 2 U.S.C. § 441b from four banking entities, three labor unions and five businesses.

Under 2 U.S.C. § 432(d) a political committee must obtain and keep a receipted bill, stating the particulars, for every expenditure made by or on behalf of a political committee in excess of \$100 in amount, and for any such expenditure in a lesser amount if the aggregate amount of such expenditures to the same person during a calendar year exceeds \$100. During the course of auditing the Committee, the auditors noted cash expenditures totaling \$10,620.24 which were not documented as required under 2 U.S.C. § 432(d). Although the Committee subsequently submitted documentation for cash expenditures totaling \$2,447.59, this documentation could not be traced to particular expenditures because the dates and amounts of the reported expenditures did not correspond to the dates and amounts shown on the documentation.

Under 2 U.S.C. § 434(b) (9) and (10), reports filed with the Commission must identify the persons to whom expenditures aggregating in excess of \$100 are made. Expenditures in excess of \$100 may be made to "cash" however only to replenish the petty cash fund. (11 C.F.R. § 102.10) The Commission believes that the Committee made cash expenditures in excess of \$100 for reasons other than to replenish the petty cash fund and by failing to report the payees of these expenditures, and has violated 2 U.S.C. §§ 434(b) (9) and (10).

Under 2 U.S.C. § 437(a) a political committee is required to make all expenditures on behalf of a candidate or to influence his election by a check drawn on a designated campaign depository unless the expenditure is in the sum of \$100 or less and is taken from a petty cash fund. The auditors noted that the Committee made a great number of cash payments for what appeared to be large individual expenses such as paint, lumber, sound equipment, etc. The Commission believes that these individual expenditures exceeded \$100 and therefore should have been paid for by checks drawn on the designated accounts. Furthermore, the Committee failed to keep a record of petty cash disbursements as required under 2 U.S.C. § 437(b).

The Commission found reason to believe that the Committee violated 2 U.S.C. § 441b. This section prohibits political committees from accepting corporate, labor and national bank contributions. The Commission also found reason to believe that FOHB violated 2 U.S.C. § 441b by accepting corporate and national bank contributions. Please see the attached list for both committees.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

All copies of verification shall remain confidential in accordance with 5 U.S.C. § 5379(a)(3) unless you advise the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clara Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

60040204498

Prohibited Contributions Accepted by the Committee for the
 Re-Election of Congressman Carlos Badillo

Local 122 - Novelty Workers Union	\$100
Pocketbook and Novelty Workers Union	\$100

Prohibited Contributions Accepted by the Friends of
 Herman Badillo:

United American Bank	\$100
	\$200
Union Federal Savings & Loan Association of N.Y.	\$100
Equitable Federal Savings and Loan Association of N.Y.	\$100
Banco Popular de Puerto Rico	\$200
Pocketbook & Novelty Workers Union	\$200
Joint Council No. 16	\$200
Washable Clothing, Sportswear & Novelty Workers Union	\$200
Castro-Blanco, Piscioneri, & Feder, P.C.	\$300
El Barrio Chamber of Commerce	\$50
NAC Realty Company	\$200
I.G.C., P.C.	\$100
Lipsig, Sullivan, Mollen and Liapakis, P.C.	\$1,000

13040204499



FEDERAL ELECTION COMMISSION

U.S. DEPARTMENT OF JUSTICE
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Julio Forcade
United American Bank
50 Broadway
New York, N.Y. 10004

Re: MUR 954

Dear Mr. Forcade:

This letter is to notify you that the Commission has found reason to believe that the United American Bank made, in March 1977, a \$100 and \$200 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a national bank to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1105 N STREET, N.W.
WASHINGTON, D.C. 20543

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Equitable Federal Savings and Loan Association
of New York
P.O. Box 1025
Brooklyn, N.Y. 11201

Re: MUR 954

Gentlemen:

This letter is to notify you that the Commission has found reason to believe that the Equitable Federal Savings and Loan Association of New York made, in March 1977, a \$100 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a corporation to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.
WASHINGTON, D.C. 20541

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Ramon Feliciano
Banco Popular de Puerto Rico
7 W. 51 Street
New York, N.Y. 10019

Re: MUR 934

Dear Mr. Feliciano:

This letter is to notify you that the Commission has found reason to believe that the Banco Popular de Puerto Rico made, in March 1977, a \$200 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b it is unlawful for a national bank to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

1111 K STREET, N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Charles Vite, President
Union Federal Savings and Loan Association
of New York,
200 E. 23rd Street,
New York, N.Y. 10010

Re: MUR 954

Dear Mr. Vite:

This letter is to notify you that the Commission has found reason to believe that the Union Federal Savings and Loan Association of New York made, in March 1977, a \$100 contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission, in writing, that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

1115 K STREET, N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Scott E. Mollen
Lipsig, Sullivan, Mollen and
Liapakis, P.C.
100 Church Street
New York, New York 10007

Re: MUR 954

Dear Mr. Mollen:

This letter is to notify you that the Commission has found reason to believe that Lipsig, Sullivan, Mollen, and Liapakis, P.C., made a corporate contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a federal election.

We have reviewed a copy of your letter, dated January 19, 1979, to Martin D. Pife which states the allocation of the \$1,000 contribution. Please explain why this contribution was remitted through a corporate check.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsey, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

100-492045-5



FEDERAL ELECTION COMMISSION

1225 K STREET N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. David Castro-Blanco
Castro-Blanco, Pacioneri
and Feder, P.C.
10 E. 35th Street
New York, New York 10016

Re: MUR 954

Dear Mr. Castro-Blanco:

This letter is to notify you that the Commission has found reason to believe that Castro-Blanco, Pacioneri and Feder, P.C. made a corporate contribution to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for any corporation to make a contribution in connection with a federal election.

The Commission has a copy of your letter, dated January 11, 1979, to Mr. Martin D. Fife explaining that the contribution in question was from "the principal[s'] private account and charged to the individuals." However, this letter does not explain whether these private accounts were reimbursable or non-reimbursable drawing accounts.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(e)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsey, who can be reached at (202) 523-6050.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1105 F STREET, N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

NAC Realty Corporation
2241 Conner Street
Bronx, New York 10466

Re: MUR 954

Gentlemen:

This letter is to inform you that the Commission has found reason to believe NAC Realty Corporation made a corporate contribution in March 1977 to the Friends of Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a federal election.

We have reviewed a copy of your letter, dated November 15, 1978, to Martin Eife which states that NAC Realty Corporation is no longer incorporated. However, our check with the Secretary of State in New York reveals that NAC Realty Corporation is still active.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1100 K STREET, N.W.
WASHINGTON, D.C. 20543

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Professor Yersel A. Beinuk
Executive Vice-President
IGC, P.C.
919 Third Avenue
New York, New York 10022

Re: MEU 954

Dear Professor Beinuk:

This letter is to inform you that the Commission has found reason to believe that I.G.C. made a corporate contribution in violation of 2 U.S.C. § 441b to the Friends of Herman Badillo.

Under 2 U.S.C. § 441b, it is unlawful for a corporation to make a contribution in connection with a federal election.

We have reviewed a copy of your letter, dated November 27, 1978, to Martin Fife which states that the funds behind this contribution were from a source other than the corporation. Please explain the source of the funds and why this contribution was remitted through the corporation.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4080.

Sincerely,

William C. Oldaker
General Counsel

1800472045



FEDERAL ELECTION COMMISSION

1325 K STREET, N.W.
WASHINGTON, D.C. 20543

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

R. Bourke
Local 888
Retail Clerks Union
229 Park Avenue South
New York, New York 10003

Re: NUR 954

Dear Mr. Bourke:

This letter is to notify you that the Commission has found reason to believe that Local 888 of the Retail Clerks Union made a \$100 labor union contribution to the Committee for Re-Election of Congressman Herman Badillo in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for any labor organization to make a contribution in connection with a federal election.

The Commission has reviewed a copy of the letter from you to the Committee for Re-Election of Congressman Herman Badillo which states that the contribution in question came from the "Active Ballot Club," the political fundraising arm of Local 888. However, this club is not registered with the Commission as a political action committee, and we require further information as to the source of the funds used for the contribution in question.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.



This letter of notification shall remain confidential in accordance with 2 U.S.C. § 4379(e)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 513-6269.

Sincerely,

William C. Cidaker
General Counsel

10/02/11 p 294



FEDERAL ELECTION COMMISSION

1125 K STREET, N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joint Council No. 15
International Brotherhood of Teamsters
265 W. 14th Street
New York, N.Y. 10011

Re: MUR 954

Gentlemen:

This letter is to notify you that the Commission found reason to believe that the Joint Council No. 15 made a \$200 labor union contribution to the Friends of Herman Badillo in March 1977 in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a labor organization to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel





FEDERAL ELECTION COMMISSION

1215 K STREET, N.W.
WASHINGTON, D.C. 20543

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Nathan Katz
Pocketbook and Novelty Workers Union
149 5th Avenue
New York, N.Y. 10010

Re: NUP 934

Dear Mr. Katz:

This letter is to notify you that the Commission found reason to believe that the Pocketbook and Novelty Workers Union made a \$200 labor union contribution to Friends of Herman Badillo in March 1977 in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a labor organization to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel



FEDERAL ELECTION COMMISSION

1225 K STREET, N.W.
WASHINGTON, D.C. 20543

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Kilmer Caban
Washable Clothing, Sportswear and
Novelty Workers Union
Local 169, A.C.W.A.
33 West 14th Street
New York, N.Y. 10011

Re: MUR 954

Dear Mr. Caban:

This letter is to notify you that the Commission found reason to believe that the Washable Clothing, Sportswear and Novelty Workers Union made a \$200 labor union contribution to Friends of Herman Badillo in March 1977 in violation of 2 U.S.C. § 441b.

Under 2 U.S.C. § 441b, it is unlawful for a labor organization to make a contribution in connection with a Federal election.

Upon making a finding of reason to believe that a violation has occurred, the Commission is required to initiate an investigation and to afford you a reasonable opportunity to demonstrate that no action be taken. As part of this process, please provide us with any legal or factual materials that you deem relevant to the Commission's investigation of this matter. We would appreciate your response within 15 days of your receipt of this letter. If no response is received, the Commission may take further action based on the information at hand.

This letter of notification shall remain confidential in accordance with 2 U.S.C. § 437g(a)(3) unless you state to the Commission in writing that you wish the investigation to be made public. The staff member assigned to this matter is Clare Lindsay, who can be reached at (202) 523-4060.

Sincerely,

William C. Oldaker
General Counsel

FILE CLERK

OSCARO A. BOWEN
STAFF DIRECTOR

SEN COSTA/SEN DIAZ

SUBJECT: AUDIT OF THE COMMITTEE FOR THE RE-ELECTION
OF CONGRESSMAN HENRY MARTINEZ ("THE COMMITTEE")
AND FRIENDS OF HENRY MARTINEZ ("FOHM")

During the audit of the above committees the following
matters were noted which are being referred to your office
for possible MUR treatment.

Attachments as stated



300402040
A. Separation of Campaign Organizations

Section 110.8(d)(1) and (2) of Title 11, Code of Federal Regulations states, in part, that if an individual is a candidate for a Federal office and a state office, he shall designate separate principal campaign committees and completely separate campaign organizations, and that no money may be transferred between or used by the separate committees, except as provided in Section 110.3(a)(2)(iv).

On May 14, 1976, the Committee held a fundraising dinner grossing approximately \$22,074.50. The receipts from the fundraiser were deposited into an account maintained for the Candidate when he was a candidate for the Office of Mayor of New York City entitled "New Yorkers for Badillo" (NYFB). Both accounts were maintained at Bankers Trust Company, a company disclosed on the Congressional Committee's statement of organization.

The NYFB account had a balance of \$100.00 at the time the fundraising receipts were deposited. Expenditures relating to the fundraiser and other operating expenses relating to the Committee were paid from the NYFB account. The net proceeds were subsequently transferred to the Congressional campaign account. Based upon the reconciliations performed during the audit, it has been determined that all receipts and expenditures relating to the fundraiser were reported on the Committee's reports.

In addition, as mentioned above, the NYFB account had a balance of \$100 when the fundraising proceeds were deposited. During 1975, the NYFB account received \$3,050.00 from business entities which were verified by the N.Y. Secretary of State's office to be registered corporations. During the period the fundraising receipts were on deposit in the NYFB account, refunds totaling \$6,823.25 were also deposited into the account. This deposit represented refunds for taxes previously paid during the Candidate's mayoral race. A portion of the refunds were subsequently expended to pay outstanding mayoral debts with the residual transferred to the Candidates Congressional District Office special account.

It is the opinion of the Audit staff that the Candidate has violated Section 110.8(d)(1) and (2) of Title 11, Code of Federal Regulations by not maintaining separate accounts for separate campaigns. However, since the Committee, as a result of subsequent amendments filed, has reported all the federally related activity from the account and has been advised of the requirements of Section 110.8(1) & (2), we recommend no further action on this matter.

3. Cash Expenditures in Excess of \$100

Section 102.10 of Title 18, Code of Federal Regulations states, in part, that a committee may not expend a public fund out of which it may make expenditures for in excess of \$100 to any person in connection with a public official's transaction. A check made payable to "cash" shall not be used in excess of \$100 except to replenish a petty cash fund.

The Committee issued a total of 67 checks payable to cash totaling \$10,620.24. Additionally, the Committee did not maintain a formal petty cash system.

A review of the Committee's expenditure records revealed that 21 of the checks payable to cash were in excess of \$100. The checks ranged from \$110 to \$1,500, and totaled \$7,375.24. Two (2) of the checks (\$1,500 and \$994.24), were drawn on the NYF account mentioned in A above.

Eighteen of the expenditures were itemized on the Committee reports, with the payee disclosed as "cash". Three (3) of the expenditures, \$1,000, \$1,500 and \$994.24 on September 13, 14 and 27, 1976 respectively, were not reported. However, the Committee reported eight (8) expenditures to cash, totaling \$2,150 on September 14, 1976, ^{1/} which were not supported with cancelled checks. It is our opinion that the eight (8) expenditures were made with the cash obtained from the checks for \$1,000 and \$1,500 written on September 13 and 14 respectively.

The Audit Division recommended in its audit letter that the Committee supply supporting documentation for all of the cash expenditures (including those less than \$100) in order to determine which ones require itemization and also recommended that the Committee amend its reports to include the unreported expenditures.

On February 16, 1979, the Committee filed an amendment itemizing the three (3) cash expenditures (\$1,000, \$1,500 and \$994.24) and deleting the eight (8) erroneously reported cash expenditures.

^{1/} The eight (8) reported expenditures are not included in the 67 checks payable to cash.

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Additionally, the Committee submitted 138 documents for cash expenditures, totaling \$2,447.59. However, as shown above, the Committee reported the payee as cash for all cash expenditures. The documentation submitted could not be identified to any particular cash expenditure, as the dates and amounts of the documentation submitted do not correspond to the dates and amounts of the cash expenditures reported.

It is the opinion of the Audit staff that the Committee has violated Section 102.10 of the Commission's Regulations by making cash expenditures in excess of \$100 for reasons other than to reimburse the petty cash fund and Section 438(d) of Title 2 by not maintaining supporting documentation for the above expenditures.

C. Prohibited Contributions

Section 441b of Title 2 of the United States Code states, in part, that it is unlawful for any national bank, corporation or any labor organization to make a contribution or expenditure in connection with any Federal election.

1. Committee For the Re-Election of Congressman Herman Badillo

A review of the Committee's contribution records disclosed that the Committee received a \$1,000 contribution from a business entity, which had been verified to be incorporated at the time the contribution was made. In addition, three (3) contributions totaling \$700 were received from apparent labor unions.

In our letter, dated November 21, 1978, we recommended that the Committee refund the prohibited contributions and provide evidence of such refunds, or provide documentation that the contributions were not funded through prohibited sources.

On January 29, 1979, the Committee submitted documentation indicating that the one (1) corporate contribution represented personal funds, being held in trust, for the contributor (See Attachment A, response accepted) and that two (2) of the apparent labor union contributions, totaling \$600, were made from accounts representing voluntary contributions (See Attachments B & C, responses accepted). Additionally, the Committee has conditionally acknowledged a \$100 contribution, received from a labor union, to have been made from prohibited sources.

The Committee terminated reporting to the Commission on November 21, 1977 (covering the period 8/30/77), but as a result of the audit additional contributions and disclosure reports were filed. On March 26, 1979, the Committee filed an additional amendment to disclose the prohibited contribution on Schedule C, as a debt owed by the Committee until a refund can be made.

2. Friends of Herman Badillo (FOHB)

During the course of the audit, it was determined that the FOHB received 11 contributions, totaling \$2,450, from six (6) businesses and four (4) banking entities which were verified to be incorporated at the time the contributions were made. Additionally, three (3) contributions, totaling \$600, were received from apparent labor unions.

In our letter, dated November 21, 1978, the Audit staff recommended that the FOHB refund the contributions, and submit evidence of such refunds, or provide documentation that the contributions were not funded through prohibited sources.

Since the FOHB was an authorized committee, and has terminated reporting with the Commission, the Audit staff verbally recommended that the principal campaign committee ("the Committee") refund the contributions which were determined to be prohibited. On February 16, 1979, the Committee disclosed on its Schedule C as debts owed, five (5) contributions from four (4) incorporated banking entities, totaling \$700. In a subsequent amendment filed on March 26, 1979, the Committee disclosed, as debts owed, three (3) labor union contributions, totaling \$600, thereby assuming the responsibility of refunding the prohibited contributions received by the FOHB.

Additionally, the FOHB submitted documentation for the contributions received from the remaining six (6) business entities. However, only two (2) responses were accepted as substantiating the permissibility of the accounts from which the contributions were funded (See Attachments D and E). The responses received from the remaining four (4) entities, in our opinion, are not acceptable as evidence that the contributions were funded through permissible sources (See Attachments F, G, H and I).

It is our opinion that the Committee For the Re-Election of Congressman Herman Badillo, the PCC, and the Friends of Herman Badillo have violated Section 441b(a) of Title 2 by accepting both labor union and corporate contributions.

Mr. Martin D. Fife
180 Madison Avenue
New York, New York 10016

Dear Marty:

In reply to your letter of November 14th concerning the \$1,000 check to New York for Badillo, please be advised that The Clark Estates, Inc. check was an agent check.

The check represented a contribution for Mrs. Anne L. Peretz with funds being held for her account by The Clark Estates, Inc. No part of the check represented funds of the Corporation.

I hope this will give you the required information. Do not hesitate to contact me if you have further needs.

Best personal regards.

Sincerely yours,

Kelward W. Stack
Secretary

FWS:vib

12/7/78...Foto to Miss Shirley Remeneski (BTM)

P23

Local 888
Retail Clerks Union
229 Park Avenue South
New York, New York 10003

Dear Sir:

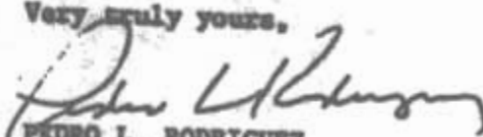
We have been advised by the Federal Election Commission that
your Organization made a contribution of \$ 100.00 on
5-14-76 to the Committee For the Re-election of
Congressman Herman Badillo.

Can you advise us whether said contribution came from an official
political fund-raising arm of your Union, registered with the Federal
Election Commission. If not, can you advise us from what source these
funds came.

We have enclosed for your convenience, a stamped, self-addressed
envelope.

Thank you for your immediate attention to this matter.

Very truly yours,


PEDRO L. RODRIGUEZ
Treasurer

Contribution came from the Active Ballot Club
which is the Political fund-raising arm of Local 888.

P25

R. Bourke

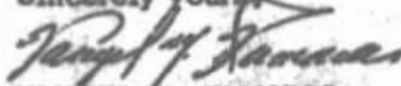
January 22, 1972

Mr. Pedro L. Rodriguez, Treasurer
Committee for the Re-election of Congressman
Herman Badillo
1414 Metropolitan Avenue
Bronx, N.Y. 10462

Dear Mr. Rodriguez:

Please be advised that the Local 6 Political
Action Fund is not registered with the Federal Election
Commission. Our contribution of \$500.00 was raised through
a voluntary contribution from our membership. These funds
are separate and apart from the union operation.

Sincerely yours,



VANGEL M. KAMARAS
President, Local 6

CF:at
opeiu/153

6

Mr. Martin D. Fife
180 Madison Avenue
New York, New York 10016

Dear Mr. Fife:

Sorry about the delay. Please be advised that the funds behind the contributions made by us on March 18, 1977, Check #2333, to the order of Martin Fife, Chairman, were from the principals private account and charged to the individuals.

Very truly yours,

CASTRO-BLANCO, PISCIONERI & FEDER, P.C.



David Castro-Blanco

/nb

Photocopy this letter to FEC, Washington DC
w/photocopies letters 11/9/78 & 12/13/78 of Martin D. Fife

00040204535

November 20, 1978

Mr. Martin D. Fife
180 Madison Avenue
New York, New York 10016

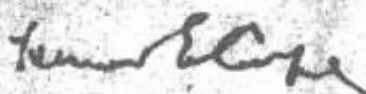
Dear Mr. Fife:

I am responding to your letter of November 9, which has just reached me. While the check for \$100.00 was drawn against Herman E. Cooper, P.C. account, it was charged to me personally as are other drawings representing compensation.

I hope that the foregoing will meet the contribution problems. If not, let me know what else it might require.

Best wishes.

Yours truly,


Herman E. Cooper

HEC/lm

PHOTOCOPY TO FEC, WASHINGTON, D. C.
w/photocopy ltr. 11/9/78 of Martin D. Fife

1445 Madison Avenue, New York, N. Y. 10017

LOUIS A. MALAVE
Executive Director

December 14, 1978

President
GEORGE J. JONES
First Vice President
JULIA K. JONES
Second Vice President
ANTONIO DE JESUS

Third Vice President
RAMON CONTRERAS

Treasurer
JOSE RODRIGUEZ

Secretary
JOSE VALLE

Members of the Board

ANTONIO RODRIGUEZ
JOSE RODRIGUEZ
JOSE RODRIGUEZ
JOSE RODRIGUEZ
JOSE RODRIGUEZ

Alternate Members
GERARDO RODRIGUEZ

Mr. Martin D. Fife
180 Madison Avenue
New York, N. Y. 10016

Dear Mr. Fife:

In reply to your letter of November 10, 1978 regarding a \$50 check drawn on the El Barrio Chamber of Commerce account and payable to Balen Denis in connection with the dinner for the Honorable Herman Badillo at the Essex House, March 18, 1977, please be advised that this represented a personal donation from one of our members and it was rendered through our account.

I apologize for my delay in replying to your letter and for any inconvenience it may have caused.

I take this opportunity to wish you and yours a Merry Christmas and a prosperous New Year.

Sincerely,


Louis A. Malave
Executive Director

LAM/mtv

cc: The Hon. Herman Badillo
Deputy Mayor of New York
City Hall
Mr. Gilberto Ruiz, Pres.
El Barrio Chamber of Commerce

PHOTOCOPY TO FEC, WASHINGTON D. C.
w/photocopies ltrs. 11/10/78 & 12/12/78 of Martin D. Fife

MEMORANDUM FOR: SAC, WASHINGTON, D. C.
(Please see notation below)

November 10, 1978

NAC Realty Co.
2241 Corner Street
Brooklyn, New York 10466

Gentlemen: RE:- Your check for \$200.00, received
in connection with the dinner for
The Honorable Herman Badillo
at the Essex House, March 18, 1977

The Federal Election Commission has informed us that you are
incorporated under the laws of New York State. I am surprised,
therefore, to refer to your contribution made by the subject
check.

Can you state that the particular funds behind this contribu-
tion were from a source other than the corporation regardless
of the fact that contribution was remitted by means of your
corporate check.

The check was deposited to the account of FRIENDS OF HERMAN
BADILLO, the proceeds of which account were used to retire
debts incurred in Mr. Badillo's campaign for reelection to
the Congress of the United States.

I await your reply and apologize for any inconvenience but
it is essential to have your answer.

Yours truly,

MF:EGM

Martin D. Fife

cc: The Honorable Herman Badillo
Deputy Mayor of New York
City Hall
New York, New York 10007

11/15/78...Marty:- Richard Nacliero phoned (on your red phone, so I guess he had that #
from years gone by) to say that FORMERLY it was NAC Realty Corp. but
that 2 or 3 years ago changed to NAC realty Co.. Therefore, that \$200.00
check for 1977 dinner was in order and that he wanted Herman Badillo to
know everything above board and also if he needs him, just to call.

(FEC had learned NAC was incorporated in December 1971. I guess FEC was not told
that it ~~had~~ became "unincorporated.")

EGM

November 27, 1978

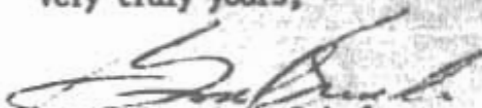
Mr. Martin D. Fife
180 Madison Avenue
New York, New York 10021

Dear Mr. Fife:

We are in receipt of your letter of November 10, 1978 relative to the \$100.00 contribution made in honor of the Honorable Herman Badillo.

Please be advised that the funds behind this contribution were from a source other than the corporation, despite the fact that this check was remitted through the corporation.

Very truly yours,



Prof. Ysrael A. Seinfeld
Exec. Vice President

YAS:bm

PHOTOCOPY TO FEC, WASHINGTON, D. C.

w/photocopy ltr. 11/10/78 of Martin D. Fife

COMMITTEE FOR THE RE-ELECTION OF CONGRESSMAN HERMAN BADILLO
c/o Mr. Pedro L. Rodriguez
1414 Metropolitan Avenue
Brooklyn, New York 11242

July 20, 1979

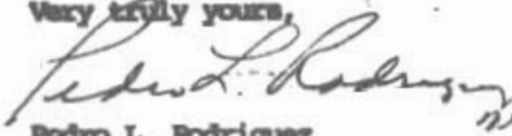
Irwin G. Cantor, P.C.
919 Third Avenue
New York, N.Y. 10022

Dear Mr. Cantor:

As per FEC regulations we are herewith returning the contribution you made to Martin Fife, Treasurer, for the Dinner honoring Congressman Herman Badillo, held at the Essex House in New York City on March 18th, 1977.

Thank you for your attention to this matter and I regret any inconvenience this may cause you.

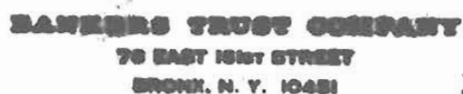
Very truly yours,


Pedro L. Rodriguez
Treasurer

TOTAL OF INVOICES
LESS _____ % DISCOUNT
LESS _____
TOTAL REDUCTIONS
AMOUNT OF CHECK

PAY TO THE ORDER OF John A. Cash, P.C.
One Hundred and 3/4

One Hundred - 3



**CHALLENGE FOR THE RE-ELECTION
OF CONGRESSMAN BERNARD BARILLI**

General Note

0210-01031 031-42006195

FEDERAL ELECTION COMMISSION

205 E STREET NW
WASHINGTON, D.C. 20541

THIS IS THE BEGINNING OF JUR #

954

Date Filmed

9/10/80

Camera No.

2

Camera man

SPC

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