



FEDERAL ELECTION COMMISSION

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

THIS IS THE END OF MUR # 1354

Date Filmed 10/10/84 Camera No. --- 1

Cameraman JRL

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FEDERAL ELECTION COMMISSION

Internal
Having strips of Proposed
Vote Sheets with Comments by Commissioners
Leicher & Owens

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):

- | | |
|--|---|
| <input type="checkbox"/> (1) Classified Information | <input type="checkbox"/> (6) Personal privacy |
| <input type="checkbox"/> (2) Internal rules and practices | <input type="checkbox"/> (7) Investigatory files |
| <input checked="" type="checkbox"/> (3) Exempted by other statute | <input type="checkbox"/> (8) Banking Information |
| <input type="checkbox"/> (4) Trade secrets and commercial or financial information | <input type="checkbox"/> (9) Well Information (geographic or geophysical) |
| <input checked="" type="checkbox"/> (5) Internal Documents | |

Signed

date

Thomas J. Wright
 10/10/84

FEC 9-21-77

84040181533



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 15, 1984

MEMORANDUM

TO : The File

SUBJECT: MUR 1354

A videotape containing television advertisements for the Carter/Mondale Presidential Committee and the Comité Amigos de Jimmy Carter, which were telecast in Puerto Rico in March, 1980, is available for public inspection.

84040481539

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Carter/Mondale Presidential) MUR 1354
Committee)
Comite Amigos de Jimmy Carter)

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 3, 1984, the Commission decided by a vote of 5-1 to take the following actions in MUR 1354:

1. Approve the conciliation agreement and letters attached to the General Counsel's Report signed October 3, 1984.
2. Close the file.

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

Attest:

10-3-84

Date

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

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

10-1-84, 9:53
10-1-84, 4:00

84040481540



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 4, 1984

Douglas Huron, Esquire
Kator, Scott and Heller
Suite 900
1029 Vermont Avenue, N.W.
Washington, D.C. 20005

RE: MUR 1354
Carter/Mondale Presidential
Committee

Dear Mr. Huron:

On October 3, 1984, the Commission accepted the conciliation agreement signed by you on behalf of the Carter/Mondale Presidential Committee and a civil penalty in settlement of violations of 2 U.S.C. §§ 433, 434, 441a(b) and 441b, provisions of the Federal Election Campaign Act of 1971, as amended. This agreement, as you know, included the respondent Comite Amigos de Jimmy Carter. Mr. Adalberto Jurado has signed on behalf of Comite Amigos. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

34040481541



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 4, 1984

Adalberto Jurado
G.P.O. Box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354
Comite Amigos de Jimmy Carter

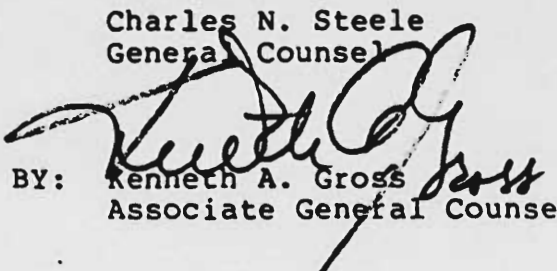
Dear Mr. Jurado:

On October 3, 1984, the Commission accepted the conciliation agreement signed by you for Comite Amigos de Jimmy Carter in settlement of violations of 2 U.S.C. §§ 433 and 434, provisions of the Federal Election Campaign Act of 1971, as amended. This agreement also included the respondent Carter/Mondale Presidential Committee and was signed by Douglas Huron on behalf of that Committee. Accordingly, the file has been closed in this matter, and it will become a part of the public record within thirty days. However, 2 U.S.C. § 437g(a)(4)(B) prohibits any information derived in connection with any conciliation attempt from becoming public without the written consent of the respondent and the Commission. Should you wish any such information to become part of the public record, please advise us in writing.

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

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Conciliation Agreement

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

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

III. Respondents enter voluntarily into this Agreement with the Commission.

IV. The Commission and the respondents agree that the pertinent facts in this matter are as follows:

1. Respondent, Carter/Mondale Presidential Committee, was the principal campaign committee for Jimmy Carter's 1980 primary presidential effort.

2. Respondent, Comite Amigos de Jimmy Carter, registered on March 6, 1980, as an unauthorized committee supporting the candidacy of Jimmy Carter.

3. Comite Amigos de Jimmy Carter filed only one report of receipts and expenditures covering March 1, 1980 through April 30, 1980.

4. Total expenditures by Comite Amigos de Jimmy Carter on behalf of Jimmy Carter were \$249,623.00.

5. Outstanding debts owed by Comite Amigos de Jimmy Carter total \$125,000 at this time.

6. The advertising vendor used by both respondent committees was Joe Franco and Associates.

7. Officials of respondent committees in Puerto Rico consulted and cooperated concerning advertising strategy and production on behalf of Jimmy Carter in connection with the Puerto Rican primary election.

8. The \$249,623 expended by Comite Amigos de Jimmy Carter added to the Carter/Mondale Committee expenditures causes the Carter/Mondale Committee to exceed the overall expenditure limitation of \$14,720,000.

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V. WHEREFORE, the Federal Election Commission has found probable cause to believe that:

1. Both respondent committees' failure to register as affiliated committees is a violation of 2 U.S.C. § 433.

2. The Comite Amigos de Jimmy Carter's failure to file reports of receipts and expenditures is a violation of 2 U.S.C. § 434.

3. The Carter/Mondale Committee's failure to file reports of receipts and expenditures reflecting financial activity by the Comite Amigos de Jimmy Carter is a violation of 2 U.S.C. § 434.

4. The Carter/Mondale Committee's expenditures exceed the overall expenditure limitation in violation of 2 U.S.C. § 441a(b)(1).

VI. Because the respondents and the Commission desire to conclude this matter without further formal proceedings, respondents will pay a civil penalty of Ten Thousand Dollars (\$10,000) to the Treasurer of the United States pursuant to 2 U.S.C. § 437g(a)(5)(A).

VII. Comite Amigos de Jimmy Carter will amend its reports to reflect all of its financial activity.

VIII. Respondents agree that they 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.

IX. 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

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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.

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

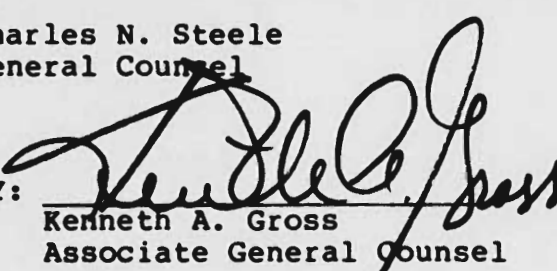
XI. Respondents shall have no more than thirty (30) days from the date this agreement becomes effective to comply with and implement the requirements contained in this agreement and to so notify the Commission.

XII. This Conciliation Agreement constitutes the entire agreement between the parties on the matters raised herein, and no other statement, promise, or agreement, either written or oral, made by either party or by agents of either party, that is not contained in this written agreement shall be valid.

FOR THE COMMISSION:

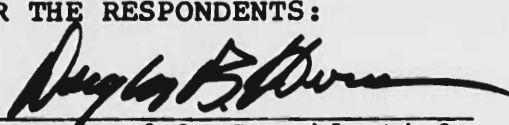
Charles N. Steele
General Counsel

BY:

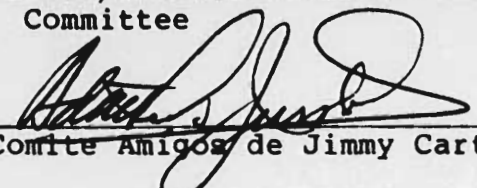

Kenneth A. Gross
Associate General Counsel

October 3, 1984
Date

FOR THE RESPONDENTS:


Carter/Mondale Presidential
Committee

August 2, 1984
Date

X 
Comite Amigos de Jimmy Carter

September 19, 1984
Date

34040481546



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Douglas B. Huron, Esquire
Stein and Huron
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MUR 1354

Dear Mr. Huron:

On , 1983, the Commission determined there is probable cause to believe that your clients committed violations of the Federal Election Campaign Act of 1971, as amended, in connection with expenditures made on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the repayment, to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the repayment payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

cc: Adalberto Jurado, Treasurer
Comite Amigos de Jimmy Carter

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[Handwritten signature]
10/4



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 6, 1983

Luis Rodriguez Bigas, Esquire
Melendez, Perez and Rodriguez Bigas
Edificio El Caribe, Piso 14
Avienda Las Palmeras
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Rodriguez Bigas:

8 4 0 4 0 1 8 1 5 1 8
This is to advise you that after an investigation was conducted, the Commission concluded on September 29, 1983, that there is no probable cause to believe that your client, Joe Franco, violated the Act. Accordingly, the file in this matter, numbered MUR 1354, has been closed as it pertains to your client. This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Luis Rodriguez Bigas, Esquire
Melendez, Perez and Rodriguez Bigas
Edificio El Caribe, Piso 14
Avienda Las Palmeras
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Rodriguez Bigas:

3 4 0 4 0 4 8 1 5 4 2

This is to advise you that after an investigation was conducted, the Commission concluded on , 1983, that there is no probable cause to believe that your client, Joe Franco, violated the Act. Accordingly, the file in this matter, numbered MUR 1354, has been closed as it pertains to your client. This matter will become part of the public record within 30 days after it has been closed with respect to all other respondents involved. Should you wish to submit any factual or legal materials to appear on the public record, please do so within 10 days. The Commission reminds you, however, that the confidentiality provisions of 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A) remain in effect until the entire matter has been closed. The Commission will notify you when the entire file has been closed.

If you have any questions, contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Smc
10/11



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 6, 1983

Douglas B. Huron, Esquire
Stein and Huron
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MUR 1354

Dear Mr. Huron:

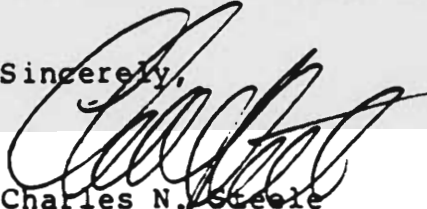
On September 29, 1983, the Commission determined there is probable cause to believe that your clients committed violations of the Federal Election Campaign Act of 1971, as amended, in connection with expenditures made on behalf of Jimmy Carter by the Comité Amigos de Jimmy Carter.

The Commission has a duty to attempt to correct such violations for a period of thirty to ninety days by informal methods of conference, conciliation and persuasion, and by entering into a conciliation agreement. If we are unable to reach an agreement during that period, the Commission may institute civil suit in United States District Court and seek payment of a civil penalty.

We enclose a conciliation agreement that this office is prepared to recommend to the Commission in settlement of this matter. If you agree with the provisions of the enclosed agreement, please sign and return it, along with the repayment, to the Commission within ten days. I will then recommend that the Commission approve the agreement. Please make your check for the repayment payable to the U.S. Treasurer.

If you have any questions or suggestions for changes in the enclosed conciliation agreement, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4529.

Sincerely,


Charles N. Steele
General Counsel

Enclosure
Conciliation Agreement

cc: Adalberto Jurado, Treasurer
Comité Amigos de Jimmy Carter

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Carter/Mondale Committee)
Comite Amigos de Jimmy Carter)

MUR 1354

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the Federal Election Commission executive session on September 29, 1983, do hereby certify that the Commission decided by a vote of 6-0 to take the following actions in MUR 1354:

1. Find probable cause to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. §433.
2. Find probable cause to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. §434.
3. Find no probable cause to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. §441b.
4. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. §433.
5. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. §434.
6. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. §441a(b).
7. Find no probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. §441b.
8. Find no probable cause to believe Joe Franco and Associates violated 2 U.S.C. §441b.
9. Approve the conciliation agreement attached to the General Counsel's report dated September 16, 1983, subject to amendment as agreed upon during the meeting of September 29, 1983.

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10. Send the notification letters attached to the
General Counsel's September 16, 1983 report

Commissioners Aikens, Elliott, Harris, McDonald, McGarry, and

Reiche voted affirmatively for the decision.

Attest:

9-30-83

Date

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

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SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 SEP 16 P 4: 54

In the Matter of)

Carter/Mondale Committee)

Comite Amigos de Jimmy)

Carter)

MUR 1354

EXECUTIVE SESSION

GENERAL COUNSEL'S REPORT

SEP 28 1983

I. BACKGROUND

This matter was generated as the result of a RAD Referral of a purportedly independent committee, the Comite Amigos de Jimmy Carter ("Comite Amigos"). At issue here is whether the expenditures made by Comite Amigos on behalf of Jimmy Carter are, in fact, independent within the meaning of the Act.

The Commission has previously found reason to believe that:

- (a) The Comite Amigos violated 2 U.S.C. § 433, § 434 and § 441b;
- (b) The Carter/Mondale Committee violated 2 U.S.C. § 433, § 434, § 441a(b) and § 441b; and
- (c) Joe Franco and Associates violated 2 U.S.C. § 441b.

On March 29, 1983, the General Counsel's Briefs recommending probable cause to believe on all violations except 2 U.S.C. § 441b were mailed to the respondents. The Carter/Mondale Committee, on April 18, 1983, requested an extension of time in which to respond to the General Counsel's Brief. On May 23, 1983, in lieu of a responsive brief, the respondent requested pre-probable cause conciliation. Joe Franco and Associates did not file a responsive brief.

II. LEGAL ANALYSIS

See OGC Brief of March 29, 1983. No responsive briefs were filed.

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III. DISCUSSION OF CONCILIATION AND CIVIL PENALTY

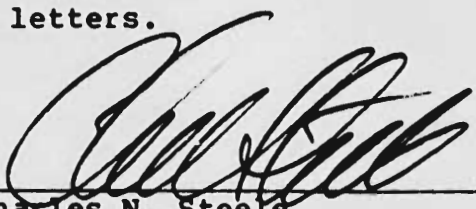
IV. RECOMMENDATIONS

1. Find probable cause to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. § 433.
2. Find probable cause to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. § 434.
3. Find no probable cause to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. § 441b.
4. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. § 433.
5. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. § 434.

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6. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. § 441a(b).
7. Find no probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. § 441b.
8. Find no probable cause to believe Joe Franco and Associates violated 2 U.S.C. § 441b.
9. Approve attached conciliation agreement.
10. Send attached notification letters.

16 September 1983
Date


Charles N. Steele
General Counsel

Attachments

Proposed conciliation agreement
Letters (2)
(6 pages attached)

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SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION 83 JUN 17 P 4: 59
WASHINGTON, D.C. 20463

June 17, 1983

MEMORANDUM

TO: The Commission

FROM: Charles N. Steele
General Counsel

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

SUBJECT: Pre-probable Cause Conciliation
MUR 1354

On March 29, 1983, the Carter/Mondale Committee and the Comite Amigos de Jimmy Carter were sent the General Counsel's briefs recommending probable cause to believe in connection with apparent coordinated expenditures by the two committees.

The Comite Amigos did not file a responsive brief. The Carter/Mondale Committee, on April 18, 1983, requested an extension of time in which to respond to the General Counsel's brief. The Carter/Mondale Committee was granted an extension until May 23, 1983 in which to respond. On that date, a letter was submitted by counsel requesting pre-probable cause conciliation.

In his letter, counsel reiterates his earlier position that both Terry O'Connell and Evan Dobelle deny authorizing or approving the formation of and content of the purportedly independent advertisements placed by Comite Amigos.

Counsel concedes that Angel Vierra Martinez may have been involved with Comite Amigos but contends that Mr. Martinez was not an agent of the Carter Committee as defined by 11 C.F.R. § 109. This office disagrees with the counsel's position.

As defined by 11 C.F.R. § 109.1(b)(5):

"Agent" means any person who has actual oral or written authority, either express or implied, to make or to authorize the making

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of expenditures on behalf of a candidate, or means any person who has been placed in a position within the campaign organization where it would reasonably appear that in the ordinary course of campaign-related activities he or she may authorize expenditures.

Mr. Martinez testified that he visited the campaign headquarters of the Carter/Mondale Committee in Washington, D.C. two months prior to the presidential primary. At that time, Martinez testified that he was officially designated as the campaign coordinator for Puerto Rico by Robert Strauss and Tim Kraft.

Martinez also testified that Terry O'Connell was present at a news conference in Puerto Rico at which Martinez was designated campaign coordinator.

According to testimony, the National Committee told Martinez the Puerto Rico budget had been designated at \$25,000; Martinez was then sent \$10,000 in pre-printed drafts of a Carter account in denominations of \$50 to \$500 which Martinez was authorized to sign. Martinez testified that he used the drafts for various expenses including \$3,700 in drafts which he sent to the telephone company; all but the \$3,700 in drafts paid to the phone company cleared the Carter account. The phone company advised Martinez that the Carter/Mondale account in the States had been closed and, therefore, the \$3,700 in drafts could not be honored. */

Additionally, Mr. Martinez appears in a television advertisement paid for by the Carter/Mondale Committee and, by his own account, was involved in a great deal of field work on behalf of the Carter/Mondale Committee.

*/ According to his testimony, Martinez had personally signed the checks to the telephone company and did not want his name associated with checks which had not been honored. He therefore asked the New Democratic Party to pay the telephone bill which they did. This appears to be an in-kind contribution to the Carter/Mondale Committee by the New Democratic Party which should have been reported. However, the amount of funds which appear to be in violation in connection with the telephone bill is small relative to the main issues in this matter. Therefore, this Office does not contemplate recommending any further action in this regard.

Memorandum to the Commission
Pre-probable Cause Conciliation
MUR 1354
Page 3

We believe that the evidence gathered during our investigation clearly identifies Mr. Martinez as an agent of the Carter/Mondale Committee. Counsel has not presented evidence to refute our contention on this point.

Recommendations

1. Approve attached conciliation agreement.
2. Send attached notification letter.

Attachments

Huron Letter of May 16, 1983
Conciliation Agreement
Notification Letter
(8 pages attached)

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RECEIVED AT THE FED
Coca #157
83 MAY 23 411:28

STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

DOUGLAS B. HURON:
EILEEN M. STEIN
—
CHRISTINE L. OWENS:
—
NOT ADMITTED IN MARYLAND

(202) 797-3680

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20815
(301) 657-9220

May 16, 1983

Charles N. Steele, Esquire
General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20005

23
P 2:29

re: MUR 1354

Dear Mr. Steele:

I am writing in response to your letter of March 29, 1983 concerning MUR 1354. We appreciate being given until May 23 to reply. As you know, I wrote to the Commission setting forth our committee's position on this matter on January 25, 1982, and on July 13, 1982 I forwarded interrogatory responses from Evan Dobelle, Robert J. Keefe and Terry O'Connell.

The charges contained in the General Counsel's brief are totally at odds with our information. No officials from our national campaign encouraged the formation of Comite Amigos de Jimmy Carter; nor did such individuals coordinate expenditures with representatives of Comite Amigos.

Specifically, Terry O'Connell recalls attending a state committee meeting in late January or early February 1980, during which Carter campaign strategy was one of several items discussed. Joe Franco attended that meeting and Virgilio Ramos also may have, but Carlos Romero Barcelo certainly did not and O'Connell does not recall whether Efren Santiago attended. O'Connell believes that Buddy James was the only other person from the mainland who was present; James was not a Carter representative. There was no "Carter/Mondale attorney" at the meeting; nor were there any other Carter personnel.

The only discussion of independent expenditures at the meeting was that which is reported in Paragraph 15 of Mr. O'Connell's affidavit of July 7, 1982. After being asked whether individuals could raise or spend their own money, O'Connell

explained that any such activities had to be entirely independent of, and separate from, the Carter/Mondale campaign and that strict adherence to all Federal election rules and regulations was required. I did not

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directly or indirectly encourage anyone to start an independent campaign.

O'Connell is not fluent in Spanish. If there was further discussion of independent activities in that language, he is not aware of it. He never dealt with any "unnamed Carter/Mondale lawyer" or anyone else in order to advise Joe Franco or any other person on how to circumvent election law.

Both O'Connell and Dobelle deny approving the content of any advertisements prepared by Joe Franco, including official Carter/Mondale spots. As Franco apparently admits, "the creativity was left to him." (General Counsel's brief at 7.) O'Connell had no media role, and Dobelle's only role was to authorize certain increments to the official Carter/Mondale media budget. Mr. Dobelle also denies ever discussing fundraising efforts for Comite Amigos with anyone, and he has no recollection of ever meeting Adelberto Jurado. The same is true for Mr. O'Connell. Like O'Connell, Dobelle is not fluent in Spanish.

The General Counsel's brief suggests that Comite Amigos was organized by or through Angel Viera Martinez, who served as chair of the local Carter/Mondale campaign. If this is true -- and we doubt it -- it was done without either the knowledge or encouragement of national campaign officials. Mr. Viera was not an agent of our committee under 11 C.F.R. 109. Contrary to the assertion in the General Counsel's brief, Viera did not have "signature authority on the Carter/Mondale bank account in Washington." To the best of our knowledge, Mr. Viera's only authority in this area was to sign dollar-limited drafts sent from Washington in order to pay creditors for bills incurred within the campaign budget formulated in Washington.


The fact that Carter/Mondale and Comite Amigos used the same media vendor -- Joe Franco -- proves nothing. Our committee retained Franco first. There are only a few media vendors in Puerto Rico, and we cannot be blamed if Comite Amigos later retained him.

As we have previously noted, election campaigns in Puerto Rico differ in some respects from those on the mainland. Our national campaign staff did its best to ensure compliance with all aspects of Federal election law and did not directly or indirectly encourage any of the activities of Comite Amigos.

Finally, there is ample reason to question the credibility of Joe Franco and others who point to Robert Keefe's involvement, unless the Commission has some independent basis for controverting Keefe's denial that he was in Puerto Rico during the relevant time period. And it is certainly unfair -- as well as of no probative value -- to attempt to visit the sins of an "unnamed Carter/Mondale attorney" on our committee.

As you know, MUR 1354 is the sole unresolved compliance matter involving the Carter/Mondale Presidential Committee, Inc. In order to resolve it as quickly as possible, we would request the opportunity to enter into conciliation before a determination is made as to probable cause.

Sincerely,



Douglas B. Huron

84040481561



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 3, 1983

Douglas Huron, Esquire
Stein & Huron
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MUR 1354

Dear Mr. Huron:

This is in response to your letter of April 12, 1983, in which you request an extension of time in which to file a responsive brief in the above captioned matter.

Please be advised that the Commission has granted your requested extension of time until May 23, 1983.

If you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

84040481562

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Carter/Mondale Committee

)
)
)

MUR 1354

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on April 29, 1983, the Commission decided by a vote of 4-0 to take the following actions in MUR 1354:

1. Grant the Carter/Mondale Committee an extension of time in which to file a responsive brief until May 23, 1983.
2. Send the notification letter as attached to the General Counsel's April 27, 1983 Memorandum to the Commission.

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

Attest:

5-2-83

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

4-27-83, 12:00
4-27-83, 4:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 APR 27 PI2: 00

April 27, 1983

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

SUBJECT: MUR 1354 - Extension Of Time In Which
To File A Responsive Brief

SENSITIVE

On March 29, 1983, a copy of the General Counsel's Brief was mailed recommending probable cause to believe against the Carter/Mondale Committee's violations of 2 U.S.C. §§ 433, 434, 441a(b) and 441b.

Counsel to the respondent committee has requested an extension of time in which to file a responsive brief until May 23, 1983, as he has another brief due in the United States District Court on May 16, 1983.

We believe counsel's request is appropriate and recommend that the Commission grant an extension until May 23, 1983, in which to file a responsive brief in the above-captioned matter.

Recommendations

1. Grant the Carter/Mondale Committee an extension of time in which to file a responsive brief until May 23, 1983.
2. Send attached notification.

Attachments:

Counsel's Letter
Notification Letter

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209/153
GLO-9971

RECEIVED AT THE FEC

83 APR 18 P 2: 20

STEIN & HURON
1618 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

DOUGLAS B. HURON
EILEEN M. STEIN
CHRISTINE L. OWENS
NOT ADMITTED IN MARYLAND

(202) 797-3680

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20815
(301) 657-9220

April 12, 1983

Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20005

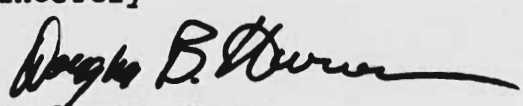
re: MUR 1354

Dear Mr. Gross:

On behalf of the Carter/Mondale Presidential Committee, Inc., I would like to request an extension until May 23, 1983 to respond to the Commission's brief in the captioned matter. The Committee's response would otherwise be due on April 18. I understand that this request goes slightly beyond the normal 30-day extension period, but I have a major brief due in United States District Court on May 16, and this will require my attention in the immediate future.

Thank you for your consideration.

Sincerely


Douglas B. Huron

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 29, 1983

Luis Rodriguez Bigas, Esquire
Melendez Perez and Rodriguez Bigas
Edificio El Caribe, Piso 14
Aviendra Las Palmeras
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Rodriguez Bigas:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your client, Joe Franco, the Federal Election Commission, on December 14, 1981, found reason to believe that your client had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

34040431566



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 29, 1983

**Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936**

RE: MUR 1354

Dear Mr. Jurado:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on March 19, 1981, found reason to believe that your Committee had violated 2 U.S.C. § 434, and instituted an investigation in this matter.

On December 14, 1982, the Commission found reason to believe that your Committee violated 2 U.S.C. §§ 433 and 441b. After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that violations of all the above referenced cites, with the exception of § 441b, have occurred.

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

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

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Letter to Adalberto Jurado
MUR 1354
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

34040481568



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 29, 1983

Douglas B. Huron, Esquire
Stein and Huron
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MUR 1354

Dear Mr. Huron:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on December 14, 1981, found reason to believe that the Carter/Mondale Committee had violated 2 U.S.C. §§ 433, 434, 441a(b) and 441b, and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that all the above cited violations, with the exception of § 441b, have occurred.

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

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

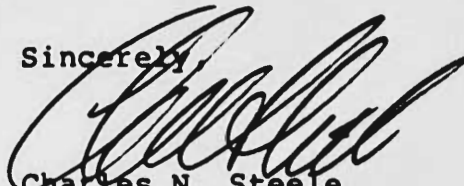
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Letter to Douglas Huron, Esquire
MUR 1354
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

34040481570



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

83 MAR 30 11:15

March 29, 1983

MEMORANDUM

SENSITIVE

TO : The Commission

FROM : Charles N. Steele
General Counsel *CS*

SUBJECT: MUR 1354

Attached for the Commission's review is a brief stating the position of the General Counsel on the legal and factual issues of the above-captioned matter. A copy of the brief and letters notifying the respondents of the General Counsel's intent to recommend to the Commission a finding of probable cause to believe on certain violations and no probable cause to believe on others was mailed on March 29, 1983. Following receipt of the respondents' replies to these notices, this Office will make a further report to the Commission.

Attachments

Briefs (NOTE: Identical text pages 1-13/three
different recommendation pages numbered 14)
Letters to respondents - three

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Comite Amigos de)
Jimmy Carter) MUR 1354
Carter/Mondale Presidential)
Committee)
Joe Franco and Associates)

GENERAL COUNSEL'S BRIEF

I. STATEMENT OF THE CASE

This matter was generated as the result of a RAD Referral of a purportedly independent committee, the Comite Amigos de Jimmy Carter ("Comite Amigos"). At issue here is whether the expenditures made by Comite Amigos on behalf of Jimmy Carter are, in fact, independent within the meaning of the Act.

The Commission has previously found reason to believe that:

- (a) The Comite Amigos violated 2 U.S.C. § 433, § 434 and § 441b;
- (b) The Carter/Mondale Committee violated 2 U.S.C. § 433, § 434, § 441a(b) and § 441b; and
- (c) Joe Franco and Associates (advertising vendor) violated 2 U.S.C. § 441b.

During the course of our investigation, orders were issued and all officers of both Comite Amigos and the Carter/Mondale Re-election Committee answered interrogatories at least once; in some cases, several times. The Carter/Mondale Committee's assertions concerning independence were consistently refuted by Joe Franco's responses. Therefore, the Office of General Counsel recommended and the Commission approved the taking of depositions because so many contradictions remained unsettled.

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The following individuals were deposed:

- (a) Joe Franco - Vendor
- (b) Adalberto Jurado - Treasurer of Komite Amigos
- (c) Angel Viera Martinez - Carter/Mondale Representative in Puerto Rico

II. LEGAL ANALYSIS

Joe Franco and Associates was the vendor used for advertising by both the Carter/Mondale Committee and Komite Amigos. This fact alone, the use of a common vendor, raises questions as to the independence of Komite Amigos.

Section 431(17) of Title 2 of the U.S. Code defines independent expenditures as:

an expenditure by a person expressly advocating the election or defeat of a clearly identified candidate which is made without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

Commission regulations at 11 C.F.R. § 109 provide further clarification of the concepts of cooperation and consultation and provide for the application of certain presumptions against the independence of expenditures under specified circumstances.

11 C.F.R. § 109.1(b)(4)(A) and (B). Thus, an expenditure is presumed not to be independent if it is: (A) based upon information about the candidate's plans, projects or needs provided to the expending person by an agent of the candidate with a view toward having the expenditure made; or (B) if it is made

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by a person who is or has been authorized to raise or expend funds, is an officer of an authorized committee or has been receiving compensation from the candidate, candidate committee, or agent.

Further, the Commission in Advisory Opinion 1979-80 discusses whether a vendor or a consultant employed by a candidate might jeopardize the independence of a political committee's expenditures if the political committee uses the same vendor or consultant.

...if an agency relationship exists or existed, or the expenditure is based on information provided by the candidate or candidate's agent, or the expenditure is "made by or through" a person described in § 109.1(b)(4)(i)(B), the presumption is that the expenditure is not independent and the result may be an in-kind contribution to the candidate by the person making the expenditure.

In this case, the vendor acted as consultant to both committees simultaneously and there is no question that he used information regarding strategy, provided him by the candidate's agents with a view toward having an expenditure made by the Comite Amigos and, indeed, this same information regarding strategy was used by both committees. However, the issue of independence in this case does not rest solely on the theory of common vendor. Testimony indicates that the independent committee was created and controlled by the principal committee and the officers of the independent committee were merely figureheads who had no decision making authority whatsoever. The

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testimony of the three above mentioned individuals is described below.

According to Joe Franco's oral testimony and written answers to Commission orders, the same individuals directed media buys for the Carter/Mondale campaign and Comite Amigos.

Mr. Franco testified that he was first approached concerning Carter campaign advertising by Angel Viera Martinez, Speaker of the House as well as the Carter/Mondale Committee coordinator in Puerto Rico. Franco was a friend of Martinez and had done political advertising for him in the past. According to Franco, Martinez advised him of his position with the Carter/Mondale Committee and asked him to prepare a campaign strategy and budget proposal for presentation to the Carter/Mondale officials upon their arrival in Puerto Rico. Franco recalls immediately telling Martinez that it would cost at least \$250,000 to run a successful campaign against Senator Kennedy. Martinez then instructed Franco to prepare a media plan based on that \$250,000 figure.

Franco testified that in the middle of February he was called by Martinez to attend a meeting in his office at the Capitol with Carter officials from Washington in attendance. Franco states that to the best of his recollection, the following individuals were present:

- (a) Virgilo Ramos, Assistant to the Governor of Puerto Rico;
- (b) Carlos Romero Barcelo;
- (c) Efren Santiago, Assistant to Martinez;

- (d) Terry O'Connell, Carter/Mondale Committee;
- (e) Buddy James, Carter/Mondale Committee; and
- (f) a Carter/Mondale attorney whose name Jurado could not recall.

In this meeting, Franco was advised that the Carter/Mondale account would be awarded to his company. However, according to Franco, the unnamed lawyer told him that the proposed budget of \$250,000 posed a problem because the national committee only allocated \$20,000 to Puerto Rico. The lawyer allegedly told Franco they would have to

create a local organization completely separate from the Carter/Mondale Committee that could raise and spend that [amount of] money on behalf of Jimmy Carter, Friends of Jimmy Carter. Finally, the Committee was called Comite Amigos de Jimmy Carter (Franco deposition, page 23). 1/

At this point, Franco testified that discussions continued as to how to create the committee and who should serve as its officers. Suggestions for officers were made by various individuals at the meeting. According to Franco, a call was then placed by Martinez to Manuel Perez Rodriguez, during which he was asked to act as president of the Comite Amigos. After Rodriguez had accepted, Joe Franco was put on the telephone for purposes of setting up a meeting between the two in the near future.

1/ According to Franco, the Carter/Mondale Committee eventually approved payment of only \$63,000 in authorized advertising.

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Franco further testified that Adalberto Jurado was also telephoned during the meeting and was asked if he would be the treasurer of Comit  Amigos. Jurado was characterized by Franco as a close friend of Efren Santiago, who suggested his name for treasurer of Comit  Amigos to Martinez. 2/

Franco stated that the unnamed lawyer with the Carter/Mondale officials appeared to be an expert on independent expenditure committees and did most of the talking. However, Franco testified that O'Connell was involved as well.

Mr. O'Connell, you know, sometimes he added, you know, if the lawyer told me something he would come over and say, "Listen, you have to be careful with this, careful with this other thing. The billing, don't mention that we were here." (Franco deposition, page 28)

Franco testified that the day after the alleged meeting took place he and Martinez met to decide on fundraising efforts for Comit  Amigos.

During the course of records review, it was discovered that one of the Joe Franco invoices for Comit  Amigos is addressed to Angel Viera Martinez of the Carter/Mondale Committee. When questioned on this point, Franco testified that the bill was sent to Martinez because it was in connection with a fundraiser conceived by Martinez for the reduction of the Amigos debt.

2/ Jurado does not dispute the fact that he was called by Martinez' office and asked to serve as treasurer; however, he disputes Franco's assertion that he later appeared at the meeting.

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Franco stated that Martinez planned several fundraisers to reduce Amigos bills because Martinez felt a moral obligation to do so.

Additionally, Franco contends that Evan Dobelle saw virtually all Carter television advertisements and approved them prior to publication even though only one was authorized for payment from Carter/Mondale funds; the others billed to Comite Amigos.

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Franco testified that Terry O'Connell made one advertisement decision prior to Dobelle's arrival on the island. Franco said he had produced a radio advertisement for Comite Amigos in which an actor imitating Senator Kennedy's voice says, "on to defeat," in spanish, at the end of a listing of his primary losses. Because this might offend the Carter strategy of positive advertising, O'Connell was called to listen to the tape and give authorization. According to Franco, Virgilo Ramos (Assistant to the Governor) and Angel Viera Martinez were also present. Franco testified that on several occasions Jurado and Martinez came to his office (together) to discuss advertising for both committees. Franco says that while Dobelle and O'Connell participated in decision making, the creativity was left to him, and he looked to Martinez for final approval.

Adalberto Jurado, treasurer of the Comite Amigos, was also deposed. Jurado testified that he was telephoned on February 18 by Martinez' office and was asked to be treasurer of Comite Amigos. After he accepted, he recalls being sent either a memo or a letter listing the names of other individuals involved in

Comite Amigos. FEC records indicate that the Statement of Organization filed by Comite Amigos was dated February 19th, one day after the alleged meeting. In response to a question concerning the origin of Comite Amigos, Jurado testified that his impression was that the idea of formation of Comite Amigos was that of Viera Martinez, who provided him with the names of Amigos officers. Whether or not his impression was correct, the record shows that the officers of Comite Amigos were not the creators of this committee.

Under questioning, Jurado stated that he was not familiar with the term "independent expenditure" or the Federal Election Campaign Act. Juan Garcia, the Vice President of Comite Amigos, has stated in a sworn affidavit that he had no knowledge of his position as Vice President of Comite Amigos and never gave permission for his name to be used as such. Antonio Alfonso, secretary of Comite Amigos, is deceased.

Jurado states that he met at Joe Franco's office with Dobelle, O'Connell and Bob Keefe a week to ten days before the primary to discuss fundraising efforts for Comite Amigos. When told that Keefe denied ever being in Puerto Rico, Jurado said he could be mistaken about the name. ^{3/} According to Jurado, at

^{3/} Both Franco and Jurado have stated that they met with Bob Keefe in Puerto Rico. However, Keefe has stated under oath that he was not in Puerto Rico during the relevant time period.

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this meeting with Carter officials, video tapes and pictures were shown for about 1 1/2 hours at the offices of Joe Franco and Associates.

As the advertisements for Comit  Amigos continued to be developed and aired, Jurado testified that he repeatedly told Franco that the Amigos treasury did not have sufficient funds to cover costs but Franco continued with the advertising blitz anyway. Jurado testified that he believed Franco was receiving instructions from some other source and was being told to continue production. Jurado believed that he and Rodriguez had no authorization to stop the advertising.

Martinez, when questioned about the alleged meeting in his office creating Comit  Amigos, acknowledged that such a meeting could have taken place but he could not confirm the exact place, date, time, or participants as specified by the examiner. However, Martinez did state that he was told by Terry O'Connell and Buddy James that an independent committee could be organized but must be kept separate from the Carter/Mondale Committee. Martinez testified that he was not acquainted with election law, but he was told that such a committee could not be related to the principal committee because the expenditures would then be charged to the candidate.

Martinez wrote a disavowal letter to Comit  Amigos on February 19, 1980, the same day that the Comit  Statement of Organization was filed. When questioned as to how he became aware of the existence of this committee prior to its

registration being received in Washington and prior to any advertising being aired, Martinez said that he thought he learned of the Comit  Amigos through a letter from its officers or orally, but was not certain. When questioned about prior testimony stating that Jurado received a call from Martinez' office concerning creation of Comit  Amigos, Martinez conceded that someone, probably Efren Santiago, could have called Jurado in this regard.

While Mr. Martinez testified that he could not confirm if the date, place and persons in attendance at the alleged meeting were the same as that testified to by Franco, he did testify that he reviewed all Comit  Amigos television spots and radio advertisements prior to publication as a friend to Franco, and as a Carter/Mondale representative, to make sure that the advertisements were in keeping with the Carter/Mondale strategy.

Doug Huron, counsel for the Carter/Mondale Committee, has stated that Martinez did not hold any official position with the Carter/Mondale Committee. Our information indicates that Martinez was, in fact, an agent of the Carter/Mondale Committee primarily evidenced by his signature authority on the Carter/Mondale bank account in Washington.

Martinez states that Franco showed him advertisement segments for both the Carter/Mondale Committee and Comit  Amigos prior to being aired.

...as campaign coordinator, I was responsible to everything within the limits of the law, the federal law, and the instructions I had

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received, and the briefing I had received...He (Joe Franco) showed me, represented me the spot he had for the Carter/Mondale and the Amigos de Jimmy Carter. (See Martinez deposition, pages 79-80).

In response to whether he approved Amigos advertisements, Martinez stated:

No, I didn't approve. I just -- whenever Joe Franco had something, because he created all this, and everybody relied on his experience, he called me to see the T.V. spot, and I asked him to call me because I just wanted that if he had a T.V. spot in relation to Amigos de Jimmy Carter, that this spot won't be related with Carter/Mondale. And besides that, I wanted to see that the spot won't be against the direction -- the instructions I had of a positive campaign. (See Martinez, page 83).

No, no, no, not approved, because I just saw the spot, the ads, just to see if -- as if I were supervising. No decision. If I would have seen something which would have mixed the campaign of the Amigos de Jimmy Carter with the Carter/Mondale, I would have said that it could not be placed because it is not in conformity with the federal law. (Martinez deposition, page 86).

While the Carter officials have stated under oath that they were not knowingly involved in the development of any activities of Comit  Amigos, our investigation indicates that Comit  Amigos does not meet the standards for independence set forth in the Act.

The issues in this case which we believe negate the independence of Comit  Amigos are as follows:

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Use of Common Vendor

Joe Franco and Associates used the same information and strategy in the development and creation of advertisements for both committees.

Carter/Mondale Agent Involved in Amigos Activities

Angel Viera Martinez was an agent of the Carter/Mondale Committee and in that capacity was and still is involved in fundraising activities for the Comit Amigos and also previewed advertisements for the Comit Amigos.

Comite Amigos Officers Lack of Control

With the information at hand, it is not certain which individuals created and operated Comit Amigos, but the evidence indicates that the officers listed on the registration were in name only and Comit Amigos was not conceived of or operated by its officers.

Based on this close association between the two committees, the activities of Amigos cannot be considered independent of those of the Carter/Mondale Committee and therefore are considered authorized. This fact is not reflected on either committee's Statement of Organization in violation of 2 U.S.C. § 433.

If the expenditures by Comit Amigos cannot be considered independent within the meaning of the Act, its expenditures must then be considered authorized expenditures by the Carter campaign and, as such, should have been reported accordingly. Both

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committees' failure to report their financial activity in accordance with 2 U.S.C. § 434(b) leads to a conclusion that there is probable cause to believe that the referenced section was violated.

Since the time of the last audited computation of August 13, 1980, the Carter Committee was only \$188,000 away from the \$14,710,000 overall expenditure limit. Therefore, if Carter/Mondale expenditures are combined with the \$248,000 expended by Comitè Amigos, the limitations of § 441a(b)(1) have been exceeded.

Evidence indicates that no written contract between Joe Franco's organization and Comitè Amigos or the Carter/Mondale Committee exists. However, we do not find this to be outside the normal course of business as 40% of Franco's accounts do not have written contracts. Thus, we no longer believe a violation of § 441b was committed, based solely on the absence of a contract.

Still outstanding at this time is approximately \$25,000 in debts owed on the Carter/Mondale account and \$125,000 on the Comitè Amigos account. Joe Franco and Associates sued and won a judgment against the Carter/Mondale Committee's debt and fundraising activities continue in an effort to reduce the Comitè Amigos account. Based on his attempt to recover the monies owed him, we believe that Joe Franco has not extended credit outside his normal business practices. Therefore, we recommend no probable cause to believe that violations of 2 U.S.C. § 441b have


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been committed by any of the respondents, either by extension of credit or by entering contractual agreements outside the normal course of business.

III. RECOMMENDATION

1. Find no probable cause to believe that Joe Franco and Associates violated 2 U.S.C. § 441b.

25 March 1963
Date



Charles N. Steele
General Counsel

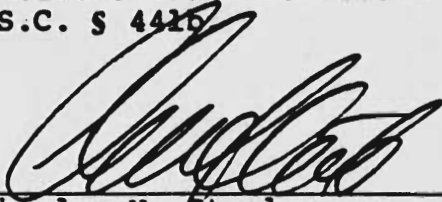
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been committed by any of the respondents, either by extension of credit or by entering contractual agreements outside the normal course of business.

III. RECOMMENDATIONS

1. Find probable cause to believe that the Comité Amigos de Jimmy Carter violated 2 U.S.C. § 433.
2. Find probable cause to believe that the Comité Amigos de Jimmy Carter violated 2 U.S.C. § 434.
3. Find no probable cause to believe that the Comité Amigos de Jimmy Carter violated 2 U.S.C. § 441b.

25 March 1983
Date



Charles N. Steele
General Counsel

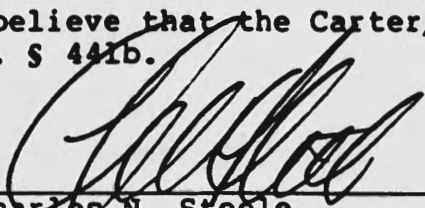
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been committed by any of the respondents, either by extension of credit or by entering contractual agreements outside the normal course of business.

III. RECOMMENDATIONS

1. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. § 433.
2. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. § 434.
3. Find probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. § 441a(b).
4. Find no probable cause to believe that the Carter/Mondale Committee violated 2 U.S.C. § 441b.

26 March 1983
Date



Charles N. Steele
General Counsel

34040431587



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 1983

Douglas B. Huron, Esquire
Stein and Huron
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MUR 1354

Dear Mr. Huron:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on December 14, 1981, found reason to believe that the Carter/Mondale Committee had violated 2 U.S.C. §§ 433, 434, 441a(b) and 441b, and instituted an investigation in this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that all the above cited violations, with the exception of § 441b, have occurred.

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

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

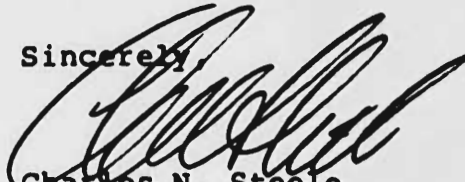
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Letter to Douglas Huron, Esquire
MUR 1354
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

84040481539



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 29, 1983

Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Jurado:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by you, the Federal Election Commission, on March 19, 1981, found reason to believe that your Committee had violated 2 U.S.C. § 434, and instituted an investigation in this matter.

On December 14, 1982, the Commission found reason to believe that your Committee violated 2 U.S.C. §§ 433 and 441b. After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find probable cause to believe that violations of all the above referenced cites, with the exception of § 441b, have occurred.

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

If you are unable to file a responsive brief within fifteen days, you may submit a written request to the Commission for an extension of time in which to file a brief. The Commission will not grant any extensions beyond twenty days.

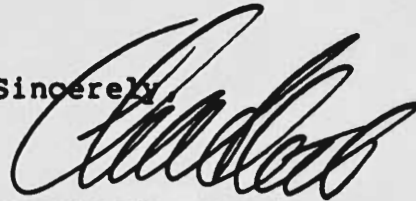
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Letter to Adalberto Jurado
MUR 1354
Page 2

A finding of probable cause to believe requires that the Office of General Counsel attempt for a period of not less than thirty, but not more than ninety days to settle this matter through a conciliation agreement.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,



Charles N. Steele
General Counsel

Enclosure
Brief

84040431591



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

March 29, 1983

Luis Rodriguez Bigas, Esquire
Melendez Perez and Rodriguez Bigas
Edificio El Caribe, Piso 14
Aviendra Las Palmeras
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Rodriguez Bigas:

Based on information ascertained in the normal course of carrying out its supervisory responsibilities, and information supplied by your client, Joe Franco, the Federal Election Commission, on December 14, 1981, found reason to believe that your client had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

After considering all the evidence available to the Commission, the Office of General Counsel is prepared to recommend that the Commission find no probable cause to believe that a violation has occurred. The Commission may or may not approve the General Counsel's recommendation.

Submitted for your review is a brief stating the position of the General Counsel on the legal and factual issues of the case. Within fifteen days of your receipt of this notice, you may file with the Secretary of the Commission a brief (ten copies if possible) stating your position on the issues and replying to the brief of the General Counsel. Three copies of such brief should also be forwarded to the Office of General Counsel, if possible. The General Counsel's brief and any brief which you may submit will be considered by the Commission before proceeding to a vote of no probable cause to believe a violation has occurred.

Should you have any questions, please contact Suzanne Callahan at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Brief

84040481592



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: DECEMBER 13, 1982
SUBJECT: MUR 1354 - Comprehensive Investigative
Report signed December 9, 1982; Received
in OCS, 12-10-82, 11:54

The above-named document was circulated to the Commission on a 24 hour no-objection basis at 2:00, December 10, 1982.

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

A copy of Commissioner Reiche's vote sheet with comments is attached.

Attachment

34040431593

December 10, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1354

Please have the attached Comprehensive Investigative Report distributed to the Commission on a 24 hour no-objection basis. Thank you.

Attachment

cc: Callahan

34040431594

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of
Comite Amigos de
Jimmy Carter

MUR 1354

82 DEC 10 All: 54

COMPREHENSIVE INVESTIGATIVE REPORT

This matter was generated as the result of a RAD Referral of Comite Amigos de Jimmy Carter ("Comite Amigos"). At issue here is whether expenditures made by Comite Amigos on behalf of Jimmy Carter are independent within the meaning of the Act.

The Commission has previously found reason to believe that:

- (a) The Comite Amigos violated 2 U.S.C. § 433, § 434 and § 441b;
- (b) The Carter/Mondale Committee violated 2 U.S.C. § 433, § 434, § 441a(b) and § 441b; and
- (c) Joe Franco and Associates violated 2 U.S.C. § 441b.

During the course of our investigation, orders have been issued and all officers of both Comite Amigos and the Carter/Mondale Re-election Committee answered interrogatories at least once; in some cases, several times. The Carter/Mondale Committee's assertions concerning independence were consistently refuted by Joe Franco's responses. The Office of General Counsel recommended and the Commission approved the taking of depositions because so many contradictions remained unsettled.

The following individuals were subpoenaed for deposition the week of October 25, 1982:

- (a) Joe Franco - Vendor
- (b) Adalberto Jurado - Treasurer of Comite Amigos

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- (c) Manual Perez Rodriguez - President of Comit  Amigos
- (d) Julio Juan Garcia - Vice President of Comit  Amigos
- (e) Angel Viera Martinez - Carter/Mondale Representative in Puerto Rico

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Joe Franco and Associates was the vendor used for advertising by both Committees. According to Joe Franco's oral testimony and written answers to Commission orders, the individuals directing media buys for the Carter/Mondale campaign and Comit  Amigos were one in the same. Mr. Franco testified that he first met with Carter/Mondale officials at a pre-arranged meeting at the office of Angel Viera Martinez, Speaker of the House and Carter/Mondale coordinator in Puerto Rico. Franco states that at that meeting, which included Terry O'Connell and Buddy James of the Carter/Mondale Committee, the idea of forming Comit  Amigos was developed. Franco states that at that meeting, he was briefed on independent expenditures and the proposed officers of Comit  Amigos were telephoned and asked to serve.

Adalberto Jurado, the Comit  Amigos treasurer, testified that he was telephoned by Martinez' office, asked to be treasurer of a political committee and told to stop by his office the next day to pick up forms to be filed with the Federal Election Commission. Jurado states that he did so and was given a list of officers to type on the statement of organization. Jurado states that he had no decision making authority and repeatedly told Franco the Comit  Amigos did not have sufficient funds to pay for

all the advertising but that the development and production of Amigos advertisements continued anyway.

Mr. Martinez testified that a meeting was held but could not confirm if the date, place and persons in attendance were the same as that testified to by Franco. However, he did testify that he reviewed all Comit  Amigos television spots and radio advertisements prior to publication as a friend to Franco and as a Carter/Mondale representative to make sure that the advertisements were in keeping with the Carter/Mondale strategy. The transcripts for the depositions were received on December 7, 1982. Upon conclusion of analysis of the transcripts, a recommendation concerning further investigation will be made by this Office.

Charles N. Steele
General Counsel

Dec. 9, 1982
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

34040481597

Juan Osoaldo Rodríguez López
ABOGADO · NOTARIO

P. O. Box 12291, Loiza Station
Santurce, Puerto Rico 00914 · 2291

Tel. 726-9917

November 22, 1982

Federal Election Commission
Office of General Counsel
1325 K Street, N. W.
Washington, DC 20463

ATTENTION: Ms. Susan Callagan

INVOICE FOR NOTARIAL SERVICES

October 27, 1982

Re: In the Matter of:
Comité Amigos de Jimmy Carter
MUR - 1354
Deposition

Appearance at U. S. Attorney Office, Federal Building for
administration of oaths of court report (Arthur G. Pineda) and of deponent
(Hon. Angel Viera Martínez) on October 27, 1982, as required by local
court rules. \$75.00 per deposition..... \$75.00

I, Juan O. Rodríguez López, hereby attest to the best of my
knowledge the foregoing invoice is true and correct and has not been paid.

Juan O. Rodríguez López

JUAN O. RODRIGUEZ LOPEZ
583-26-4552

JORL/mac

PLEASE RETURN ENCLOSED COPY WITH YOUR REMITTANCE

34040181593

Juan Osvaldo Rodríguez López
ABOGADO · NOTARIO

P. O. Box 12291, Loiza Station
Sanjurjo, Puerto Rico 00914 · 2291

Tel. 726-9917

November 22, 1982

Federal Election Commission
Office of General Counsel
1325 K Street, N.W.
Washington, DC 20463

ATTENTION: Ms. Susan Callagan

INVOICE FOR NOTARIAL SERVICES

October 26, 1982

Re: In the Matter of:
Comité Amigos de Jimmy Carter
MUR - 1354
Deposition

Appearance at U. S. Attorney Office, Federal Building for
administration of oaths of court reporter (Olivia D. Gittens) and of
deponents (Joe Franco and Irma Gómez) in October 26, 1982, as
required by local court rules. \$75.00 per deposition..... \$75.00

I, Juan O. Rodríguez López, hereby attest to the best of
my knowledge the foregoing invoice is true and correct and has not been paid.

Juan O. Rodríguez López

JUAN O. RODRIGUEZ LOPEZ
583-26-4552

JORL/mac

PLEASE RETURN ENCLOSED COPY WITH YOUR REMITTANCE

34040431599

Juan Oswaldo Rodríguez López
ABOGADO · NOTARIO

P. O. Box 12291, Loiza Station
San Juan, Puerto Rico 00914 · 2291

Tel. 726-9917

November 22, 1982

Federal Election Commission
Office of General Counsel
1325 K Street, N. W.
Washington, DC 20463

ATTENTION: Ms. Susan Callagan

INVOICE FOR NOTARIAL SERVICES

October 26, 1982

Re: In the Matter of:
Comité Amigos de Jimmy Carter
MUR -1354
Deposition

Appearance at U. S. Attorney Office, Federal Building
for administration of oaths of court reporter (Olivia D. Gittens),
interpreter (Raymond McConnie) and of deponent (Adalberto Jurado
Horta) on October 26, 1982, as required by local court rules.

\$75.00 per deposition..... \$75.00

I, Juan O. Rodríguez López, hereby attest to the best of
my knowledge the foregoing invoice is true and correct and has not been paid.

Juan O. Rodríguez López

JUAN O. RODRIGUEZ LOPEZ
583-26-4552

JORL/mac

PLEASE RETURN ENCLOSED COPY WITH YOUR REMITTANCE

84040481600



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 13, 1982

EXPRESS MAIL

Julio Juan Garcia
Ashford 1485
Santurce, Puerto Rico 00907

RE: MUR 1354

Dear Mr. Garcia:

On May 20, 1982, you received notification that the Commission had found reason to believe that the Comité Amigos de Jimmy Carter had violated 2 U.S.C. § 434, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on October 27, 1982, at 3:00 p.m., at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

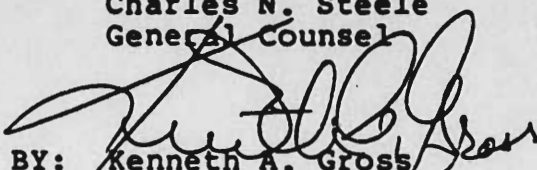
Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Letter to Julio Juan Garcia
Page 2

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040431602

TO: Julio Juan Garcia
Ashford 1485
Santurce, Puerto Rico 00907

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, beginning at 3:00 p.m., on October 27, 1982, and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on October 22, 1982, at the above stated location or at a location designated by you:

- (a) all correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comité Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission;
- (b) contemporaneous memoranda, including telephone logs, daily calendars, and any other records under your control regarding meetings, phone calls or other communications with persons associated with campaign related activities on behalf of Jimmy Carter excepting those documents previously submitted by you to the Commission.

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WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand at Washington, D.C., this 13th day of October, 1982.

Frank P. Reiche
Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

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

34040431604



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 13, 1982

EXPRESS MAIL

Manuel M. Perez Rodriguez
403 Del Parque, Suite 900
Santurce, Stop 23
San Juan, Puerto Rico 00912

RE: MUR 1354

Dear Mr. Rodriguez:

On May 20, 1982, you received notification that the Commission had found reason to believe that the Comite Amigos de Jimmy Carter had violated 2 U.S.C. § 434, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on October 27, 1982, at 1:00 p.m., at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

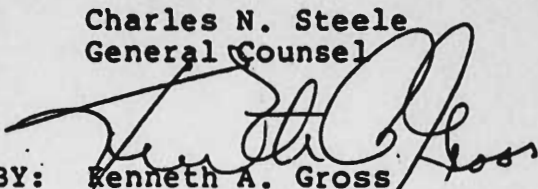
Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

Letter to Manuel M. Perez Rodriguez
Page 2

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

84040481606

TO: Manuel M. Perez Rodriguez
403 Del Parque, Suite 900
Santurce, Stop 23
San Juan, Puerto Rico 00912

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, beginning at 1:00 p.m., on October 27, 1982, and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on October 22, 1982, at the above stated location or at a location designated by you:

- (a) all correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comité Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission;
- (b) contemporaneous memoranda, including telephone logs, daily calendars, and any other records under your control regarding meetings, phone calls or other communications with persons associated with campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comité Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission.

3404031607

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this *12th* day of
October, 1982.

Frank P. Reiche
Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

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

840404816003



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 13, 1982

EXPRESS MAIL

Luis Rodriguez Bigas, Esquire
Melendez Perez and Rodriguez Bigas
GPO Box 5072
San Juan, Puerto Rico 00936-5072

RE: MUR 1354

Dear Mr. Rodriguez Bigas:

On December 14, 1981, your client received notification that the Commission had found reason to believe that Joe Franco and Associates had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires Joe Franco to appear and give sworn testimony on October 26, 1982, at 9:00 a.m., at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

340404316009

Letter to Luis Rodriguez Bigas, Esquire
Page 2

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040481610

TO: Joe Franco
c/o Luis Rodriguez Bigas, Esquire
Melendez Perez and Rodriguez Bigas
GPO Box 5072
San Juan, Puerto Rico 00936-5072

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, beginning at 9:00 a.m., on October 26, 1982, and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on October 22, 1982, at the above stated location or at a location designated by you:

- (a) all correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comite Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission;
- (b) contemporaneous memoranda, including telephone logs, daily calendars, and any other records under your control regarding meetings, phone calls or other communications with persons associated with campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comite Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission;
- (c) all transcripts, video tapes, photographs and any other materials whatsoever, used by or produced by Joe Franco and Associates in connection with the presidential campaign of Jimmy Carter including but not limited to materials provided to you by the Carter/Mondale Committee and Comite Amigos de Jimmy Carter.

34040481611

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this *12th* day of
October, 1982.

Frank P. Reiche

Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

34040431612



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 13, 1982

EXPRESS MAIL

Angel Viera Martinez
P.O. Box 3111
San Juan, Puerto Rico 00904

RE: MUR 1354

Dear Mr. Martinez:

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The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on October 27, 1982, at 9:00 a.m., at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, has been issued. The Commission does not consider you a respondent in this matter, but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

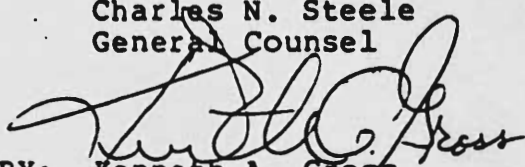
Letter to Angel Viera Martinez
Page 2

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040481614

TO: Angel Viera Martinez
P.O. Box 3111
San Juan, Puerto Rico 00904

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, beginning at 9:00 a.m., on October 27, 1982, and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on October 22, 1982, at the above stated location or at a location designated by you:

- (a) all correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comité Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission;
- (b) contemporaneous memoranda, including telephone logs, daily calendars, and any other records under your control regarding meetings, phone calls or other communications with persons associated with campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comité Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission.

34040481615

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this *12th* day of
October, 1982.

Frank P. Reiche

Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

34040431616



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 13, 1982

EXPRESS MAIL

Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Jurado:

On March 20, 1981, you received notification that the Commission had found reason to believe that the Comite Amigos de Jimmy Carter had violated 2 U.S.C. § 434, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on October 26, 1982, at 2:00 p.m., at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

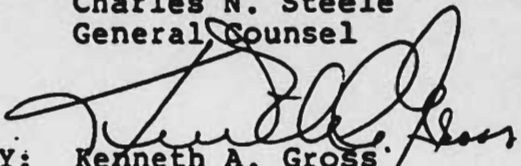
34040431617

Letter to Adalberto Jurado
Page 2

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040431618

TO: Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at the Federal Office Building, Room 101, Carlos Chardon Street, Hato Rey, Puerto Rico, beginning at 2:00 p.m., on October 26, 1982, and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on October 22, 1982, at the above stated location or at a location designated by you:

- (a) all correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comité Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission;
- (b) contemporaneous memoranda, including telephone logs, daily calendars, and any other records under your control regarding meetings, phone calls or other communications with persons associated with campaign related activities on behalf of Jimmy Carter including but not limited to the formation, operation and dissolution of Comité Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission.

34040481619

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this *12th* day of
October, 1982.

Frank P. Reiche

Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

34040481620



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
GENERAL COUNSEL

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

DATE: OCTOBER 12, 1982

SUBJECT: SUBPOENAS RE: MUR 1354

The attached subpoenas, which were Commission approved in Executive Session on October 5, 1982, have been signed and sealed this date.

34040481621

Attachments

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Comite Amigos de Jimmy Carter)

MUR 1354

CERTIFICATION

I, Lena L. Stafford, Recording Secretary for the Federal Election Commission meeting on October 5, 1982, do hereby certify that the Commission decided in a vote of 6-0 to take the following actions with regard to the above-entitled matter:

1. Approve the subpoenas attached to the General Counsel's Memorandum dated September 29, 1982.
2. Send the approved subpoenas via expedited mail for the following individuals:
 - a. Joe Franco - Vendor
 - b. Adalberto Jurado - Treasurer of Comite Amigos
 - c. Manuel Perez Rodriguez - President of Comite Amigos
 - d. Julio Juan Garcia - Vice President of Comite Amigos
 - e. Angel Viera Martinez - Carter/Mondale Representative in Puerto Rico
3. Send the notification letters attached to the General Counsel's Memorandum dated September 29, 1982.

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

Attest:

10-8-82
Date

Lena L. Stafford
Recording Secretary

84040481622



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS /JODY C. RANSOM *JCR*
OFFICE OF THE SECRETARY TO THE COMMISSION

DATE: SEPTEMBER 30, 1982

SUBJECT: ADDITIONAL OBJECTION - MUR 1354 Memorandum
to the Commission dated 9-29-82

You were notified previously of an objection by
Commissioner Elliott.

Commissioner Reiche submitted an additional objection
at 4:57, September 30, 1982.

This matter will be discussed in executive session
on Tuesday, October 5, 1982. A copy of Commissioner Reiche's
vote sheet with comments is attached.

Attachment

340404216223



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. EMMONS/JODY RANSOM *JR*
DATE: SEPTEMBER 30, 1982
SUBJECT: OBJECTION - MUR 1354 Memorandum to the Commission
dated September 29, 1982; Received in OCS,
9-29-82, 12:15

The above-named document was circulated to the Commission on
September 29, 1982 at 4:00.

Commissioner Elliott submitted an objection to this matter at
11:52, September 30, 1982.

This matter will be placed on the agenda for the Executive
Session of Tuesday, October 5, 1982.

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SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 SEP 29 P12:15

September 29, 1982

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

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

SUBJECT: Subpoenas for Deposition - MUR 1354

This matter was generated as the result of a RAD Referral of Comite Amigos de Jimmy Carter ("Comite Amigos") on January 28, 1981, alleging violations of 2 U.S.C. § 434. At issue here is whether expenditures made by Comite Amigos on behalf of Jimmy Carter are independent within the meaning of the Act.

Comite Amigos registered as an unauthorized committee supporting the candidacy of Jimmy Carter on March 6, 1980. Subsequent to its registration, the Committee filed one report covering March 1 through April 30, 1980. The report indicated that the Committee had contracted with Joe Franco and Associates for a total of \$218,099.74 in media services, presumably on behalf of President Carter's re-election campaign. The Commission found reason to believe that reporting violations had been committed and sent an order to the Committee's treasurer, Adalberto Jurado, concerning the independence of the Committee's activities.

Jurado's response raised further questions. Since that time, several orders have been issued and all officers of both Comite Amigos and the Carter/Mondale Re-election Committee have answered interrogatories.

Joe Franco and Associates was the vendor used for advertising by both Committees. According to Joe Franco, the individuals directing media buys for the Carter/Mondale campaign and Comite Amigos were one in the same. The answers submitted by Joe Franco directly refute the Carter Committee's contention that no cooperation occurred between the principal Committee and Comite Amigos on the subject of media purchases.

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None of the Carter Committee officials questioned had any recollection of attending meetings at which Amigos representatives were present, and neither Evan Dobelle nor Terry O'Connell recalls ever meeting Adalberto Jurado or Manuel Rodriguez, officers of Comite Amigos. Robert Keefe of the Carter Committee states that he was never in Puerto Rico.

Both Jurado and Franco have stated that O'Connell, Dobelle and Keefe met with them at Joe Franco's office to discuss the duration of the contracts with each Committee and the billing method to be used for the two Committees. This contradicts the Committee officials' assertion of no contact at all or, at most, incidental contact occurred.

Jurado states that the above mentioned meeting is the only meeting he attended where Carter/Mondale representatives were present. He says that he left the advertising development and strategy up to Franco.

Joe Franco maintains that representatives of the Carter/Mondale Committee were present at all meetings in which Comite Amigos advertisements were discussed. (Not necessarily in the presence of Comite Amigos officers). Joe Franco has stated under oath,

As we informed before, the accounts for the Carter/Mondale Committee and Comite Amigos were to be kept separate in our billings but the advertising strategy, media placing, decisions as to advertising productions, were ordered and/or taken by the same people. Example: Mr. Dobelle and Mr. Viera Martinez were present at all meetings and were the ones who decided what was to be done.

Franco says that Dobelle and Martinez supplied the photographs and approved all the advertising. He further states that he prepared material for one campaign and it was used by the other and that this arrangement was agreed to by Martinez, Dobelle and Keefe.

In order to clarify the above statement, another order was sent to Mr. Franco in which he was asked:

Q: By whom were you told of the arrangement to keep billings separate? What reason was given? Please give specific details.

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A: The reason for having the Comité de Amigos de Jimmy Carter was solely to raise additional funds since there were limits for expenditures for the Carter/Mondale Committee in Puerto Rico. Those present at our meetings (Angel Viera Martinez, Evan S. Dobelle, Bob Keefe, agreed to this).

Q: What individual(s) advised you as to whether the billing for a particular purchase should be billed to the account of Comité Amigos or Carter/Mondale? Please be specific.

A: Mr. Evan S. Dobelle and Mr. Angel Viera Martinez as coordinator of the Carter/Mondale Presidential Committee reviewed and checked our invoices and decided which were to be billed to each Committee.

The Carter/Mondale Committee's assertions concerning independence have consistently been refuted by Joe Franco's responses. We believe that further investigation into this matter is warranted and recommend that depositions of Comité Amigos officials and Joe Franco be taken. We plan to subpoena video tapes, radio tapes, and copies of various advertisements purchased by each Committee to compare the similarities.

We feel that depositions are necessary because so many contradictions remain unsettled. Further correspondence with individuals in Puerto Rico is not recommended because past written communications have taken an inordinate amount of time and have consistently raised more questions than have been answered. We recommend sending the subpoenas via expedited mail as past correspondence has taken over two weeks to deliver and will delay conclusion of this matter.

Recommendations

Approve and send attached subpoenas via expedited mail for the following individuals:

1. Joe Franco - Vendor
2. Adalberto Jurado - Treasurer of Comité Amigos

34040481627

Memorandum to the Commission
Subpoenas for Deposition - MUR 1354
Page 4

3. Manuel Perez Rodriguez - President of Comite Amigos
4. Julio Juan Garcia - Vice President of Comite Amigos
5. Angel Viera Martinez - Carter/Mondale Representative in Puerto Rico

Attachments

Subpoenas - five

Notification Letters - five

(20 total pages attached)

34040481628

TO: Joe Franco
c/o Luis Rodriguez Bigas, Esquire
Melendez Perez and Rodriguez Bigas
GPO Box 5072
San Juan, Puerto Rico 00936-5072

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at beginning at , and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on , 1982, at the above stated location or at a location designated by you:

- 84040481629
- (A) All correspondence, contemporaneous memoranda, including telephone logs, daily calendars and any other records or documents to you or from you or under your control pertaining to advertising strategy and budget of the Carter/Mondale Committee excepting those documents previously submitted by you to the Commission.
 - (B) All correspondence, contemporaneous memoranda, including telephone logs, daily calendars and any other records or documents to you or from you or under your control pertaining to advertising strategy and budget of Comite Amigos de Jimmy Carter excepting those documents previously submitted by you to the Commission.
 - (C) All transcripts, video tapes, photographs and any other materials whatsoever, used by or produced by Joe Franco and Associates in connection with the presidential campaign of Jimmy Carter, including but not limited to materials provided to you by the Carter/Mondale Committee and Comite Amigos de Jimmy Carter.
- 1

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this day of
, 1982.

**Frank P. Reiche, Chairman
Federal Election Commission**

· ATTEST:

Marjorie W. Emmons
Secretary to the Commission

384040481630

TO: Julio Juan Garcia
Ashford 1485
Santurce, Puerto Rico 00907

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at beginning at , and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on , 1982, at the above stated location or at a location designated by you:

- (A) All correspondence, contemporaneous memoranda, telephone logs, daily calendars and any other records or documents from or to you or under your control regarding the formation and operation of Comit  Amigos de Jimmy Carter, including but not limited to the purpose of the Committee, the advertising strategy and the budget, excepting those documents previously submitted by you to the Commission.
- (B) All correspondence, contemporaneous memoranda, telephone logs, daily calendars and any other records or documents under your control pertaining to any contacts whatsoever between you and Joe Franco or any employee of Joe Franco and Associates concerning the account of Comit  Amigos de Jimmy Carter and/or the Carter/Mondale Presidential Committee, excepting those documents previously submitted by you to the Commission.

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WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this day of
, 1982.

**Frank P. Reiche, Chairman
Federal Election Commission**

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

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4

TO: Angel Viera Martinez
P.O. Box 3111
San Juan, Puerto Rico 00904

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at beginning at , and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on , 1982, at the above stated location or at a location designated by you:

- (A) All correspondence, contemporaneous memoranda, telephone logs, daily calendars and any other records or documents from or to you or under your control regarding the formation and operation of Comit  Amigos de Jimmy Carter, including but not limited to the purpose of the Committee, the advertising strategy and the budget, excepting those documents previously submitted by you to the Commission.
- (B) All correspondence, contemporaneous memoranda, telephone logs, daily calendars and any other records or documents under your control pertaining to any contacts whatsoever between you and Joe Franco or any employee of Joe Franco and Associates concerning the account of Comit  Amigos de Jimmy Carter and/or the Carter/Mondale Presidential Committee, excepting those documents previously submitted by you to the Commission.

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WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this day of
, 1982.

**Frank P. Reiche, Chairman
Federal Election Commission**

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

3440481634

6

TO: Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at beginning at , and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on , 1982, at the above stated location or at a location designated by you:

- (A) All correspondence, contemporaneous memoranda, telephone logs, daily calendars and any other records or documents from or to you or under your control regarding the formation and operation of Comite Amigos de Jimmy Carter, including but not limited to the purpose of the Committee, the advertising strategy and the budget, excepting those documents previously submitted by you to the Commission.
- (B) All correspondence, contemporaneous memoranda, telephone logs, daily calendars and any other records or documents under your control pertaining to any contacts whatsoever between you and Joe Franco or any employee of Joe Franco and Associates concerning the account of Comite Amigos de Jimmy Carter and/or the Carter/Mondale Presidential Committee, excepting those documents previously submitted by you to the Commission.

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7

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand at Washington, D.C., this day of
 , 1982.

**Frank P. Reiche, Chairman
Federal Election Commission**

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

84040431636

TO: Manuel M. Perez Rodriguez
403 Del Parque, Suite 900
Santurce, Stop 23
San Juan, Puerto Rico 00912

At the instance of the Federal Election Commission pursuant to section 437d of Title 2 of the United States Code, you are hereby subpoenaed to appear for deposition with regard to campaign activities on behalf of Jimmy Carter. Notice is hereby given that the deposition is to be taken at beginning at , and continuing each day thereafter as necessary.

Pursuant to section 437d of Title 2, United States Code, you are hereby subpoenaed to produce on , 1982, at the above stated location or at a location designated by you:

- (A) All correspondence, contemporaneous memoranda, telephone logs, daily calendars and any other records or documents from or to you or under your control regarding the formation and operation of Comit  Amigos de Jimmy Carter, including but not limited to the purpose of the Committee, the advertising strategy and the budget, excepting those documents previously submitted by you to the Commission.
- (B) All correspondence, contemporaneous memoranda, telephone logs, daily calendars and any other records or documents under your control pertaining to any contacts whatsoever between you and Joe Franco or any employee of Joe Franco and Associates concerning the account of Comit  Amigos de Jimmy Carter and/or the Carter/Mondale Presidential Committee, excepting those documents previously submitted by you to the Commission.

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10



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

EXPRESS MAIL

Luis Rodriguez Bigas, Esquire
Melendez Perez and Rodriguez Bigas
GPO Box 5072
San Juan, Puerto Rico 00936-5072

RE: MUR 1354

Dear Mr. Rodriguez Bigas:

On December 14, 1981, your client received notification that the Commission had found reason to believe that Joe Franco and Associates had violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires Joe Franco to appear and give sworn testimony on at and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

//

Letter to Luis Rodriguez Bigas, Esquire
Page 2

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040481640

12



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

EXPRESS MAIL

Manuel M. Perez Rodriguez
403 Del Parque, Suite 900
Santurce, Stop 23
San Juan, Puerto Rico 00912

RE: MUR 1354

Dear Mr. Rodriguez:

On May 20, 1982, you received notification that the Commission had found reason to believe that the Comité Amigos de Jimmy Carter had violated 2 U.S.C. § 434, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on at and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

13

Letter to Manuel M. Perez Rodriguez
Page 2

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040431642

14



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

EXPRESS MAIL

Julio Juan Garcia
Ashford 1485
Santurce, Puerto Rico 00907

RE: MUR 1354

Dear Mr. Garcia:

On May 20, 1982, you received notification that the Commission had found reason to believe that the Comité Amigos de Jimmy Carter had violated 2 U.S.C. § 434, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on at and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

15

Letter to Julio Juan Garcia
Page 2

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040481644

160



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

EXPRESS MAIL

Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Jurado:

On March 20, 1981, you received notification that the Commission had found reason to believe that the Comité Amigos de Jimmy Carter had violated 2 U.S.C. § 434, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena which requires you to appear and give sworn testimony on _____ at _____ and provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us of the name and address of your attorney prior to the date of the deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

17

Letter to Adalberto Jurado
Page 2

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040481646

18



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Angel Viera Martinez
P.O. Box 3111
San Juan, Puerto Rico 00904

RE: MUR 1354

Dear Mr. Martinez:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached subpoena which requires you to appear and give sworn testimony on at has been issued. The Commission does not consider you a respondent in this matter, but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney present with you at the deposition. If you intend to be so represented, please advise us, in writing, of the name and address of your attorney prior to the date of deposition.

Pursuant to 11 C.F.R. § 111.14, a witness summoned by the Commission shall be paid \$30.00, plus mileage at the rate of 22.5 cents per mile. You will be given a check for your witness fee and mileage at the time of the deposition.

Letter to Angel Viera Martinez
Page 2

Please confirm your scheduled appearance with Suzanne Callahan on our toll free line (800/424-9530) within two days of your receipt of this notification.

If you have any questions please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena

34040481648

20

EXECUTIVE COMMITTEE OF THE

NEW DEMOCRATIC PARTY of Puerto Rico

P. O. Box 3111, San Juan, Puerto Rico 00904

Angel Viera Martínez, Chairman

August 20, 1982

Mr. Charles N. Steele, Esq.
General Counsel
Federal Election Commission
1325 IL St., N.W.
Washington, D.C. 20463

MUR-1354

My dear Mr. Steele:

My answers to the Federal Election Commission questionnaire received in my office on August 13, 1982, are the following:

1. President Jimmy Carter's Campaign Coordinator for the March 16, 1980 Presidential Primary. I accepted this position two months before the Presidential Primary. By that time I was the Speaker of the House of Representatives.

2. Field work. Immediate meetings with the leaders of each Congressional District and Municipalities; for general campaign organization in relation to rallies, assemblies (tertulias), house to house campaign, motorcades, get out the vote, etc., etc..

3. Nobody received pay during the campaign. All of the people involved were volunteers and the political structures were already organized when I assumed the coordination of President Carter's campaign. We used the

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leaders of the party in local politics who at the same time were democrats, but I don't have records with their names, although I can mention many of them by memory if you wish me to do it.

4. Joe Franco and Associates (Advertising Agency) was in charge of the media activities for the Carter-Mondale Presidential Committee.

5. As far as I know, the Carter-Mondale Presidential Committee handled the media expenditures on behalf of President Carter's Presidential Campaign through former ambassador Evan S. Dobelle, National Chairman of the Carter-Mondale Finance Committee.

6. I did not make any decision regarding advertising strategy, because that was up to the Carter-Mondale Committee through Mr. Evan S. Dobelle as I recall. (Enclosure I) I discussed with the democratic leaders and we made final decisions in relation to field work only.

7. I do not recall the exact date when I had knowledge of the existence of the "Comité Amigos de Jimmy Carter", but as soon as I knew of its existence I wrote its Chairman, Mr. Manuel Pérez Rodríguez, Esq., on February 19, 1980 that such Committee was not authorized by the Carter-Mondale Presidential Committee, Inc., and that all its activities could not be in any way related with the Presidential Carter-Mondale Campaign in Puerto Rico. I also told him

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that President Carter's Presidential Campaign in Puerto Rico was regulated by the Federal Election Commission and that it was absolutely necessary to comply with the law. Enclosed please find a copy of the letter as Enclosure II.

8. I don't know.

9. I did not have any conversation with anyone connected in anyway with the "Comité Amigos de Jimmy Carter" in my official capacity as Campaign Coordinator of President Carter, nor I discussed any matter regarding the campaign with any person connected with "Comité Amigos de Jimmy Carter", because as I wrote them on February 19, 1980 "Comité Amigos de Jimmy Carter" was a non-authorized committee. (Enclosure II).

10. The only occasion when I corresponded in writing with any officer of the "Comité Amigos de Jimmy Carter" was on February 19, 1980 with a letter addressed to Mr. Manuel Pérez Rodríguez, Chairman of the "Comité Amigos de Jimmy Carter", telling him that "Comité Amigos de Jimmy Carter" was not authorized by the Carter-Mondale Presidential Committee, Inc., to campaign on behalf of President Mondale. (Enclosure II)

34040481651

11. To my knowledge, nobody connected with the "Comité Amigos de Jimmy Carter" requested authorization from the Carter-Mondale Presidential Committee to place advertisements in the media.

12. Absolutely, no.

13. I do not know if any committee agents supplied pictures, statistics, texts or any other materials to "Comité Amigos de Jimmy Carter", or to Joe Franco and Associates for use in media production for "Comité Amigos de Jimmy Carter". As President Carter's Campaign Coordinator I did not provide any type of such materials.

14. No, Sir.

15. No, Sir.

16. No, Sir.

17. No, Sir.

18. I never received correspondence, memoranda, telephone logs, calendars, desk diaries, minutes, nor any document in relation to activities on behalf of President Carter's by the "Comité Amigos de Jimmy Carter". I have not either received minutes or any documentation of meetings whatsoever from Joe Franco and Associates nor from any other person.

3 4 0 4 0 4 8 1 6 5 2

On April 21, 1980 I received in the House of Representatives a copy of a letter dated April 18, 1980 from Mr. Joe Franco addressed to Mr. Evan S. Dobelle, National Finance Chairman of the Carter-Mondale Presidential Committee, Inc., which I am including for your information as Enclosure III.

On April 24, 1980 I received from Joe Franco and Associates a copy of Mr. Dobelle's answer dated April 24, 1980, which I also include as Enclosure IV.

I also received from Mr. Joe Franco and Associates' Credit Manager, Mr. Marcelino Blanco, Jr., a copy of a letter answering Mr. Evan Dobelle's, which I include as Enclosure V.

I do not have any other correspondence.

For your general information I am a Lawyer. I was former Speaker from 1969-72; Minority Floor Leader in the House of Representatives from 1973 to 1977; Speaker from 1977 to 1980; Speaker from April 22, 1981 to December 21, 1981, and at present I am the Minority Floor Leader, Vice-President of the Party in power in Puerto Rico; State-Chair of the Democratic Party of Puerto Rico and a member of the National Democratic Committee.

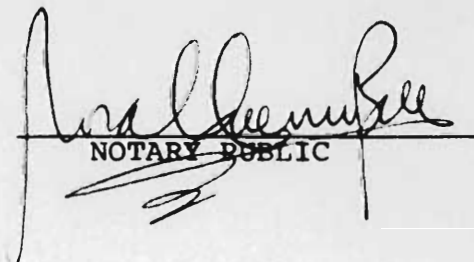
San Juan, Puerto Rico, August 20, 1982.


ANGEL VIERA MARTINEZ

AFF. NO. 2542

Sworn and suscribed before me by Angel Viera Martinez, whom I personally know, in San Juan, Puerto Rico, August 20, 1982.




NOTARY PUBLIC

34040481655

Joe Franco and Associates, Inc. / President
FROM: Evan S. Doherty

You are hereby authorized on behalf of the Carter - Mondale Presidential Committee, Inc. - S. Lee Kling Treasurer to purchase \$25,000 of television spots on behalf of our National Committee, plus production.

This will represent the solely authorized purchase of any media by the official committee to re-elect the President. A letter has been sent last month

disavowing any connection of an organization called "Amigos de Jimmy Carter" with us, and I bring this to your attention so you may so advise any of our vendors or to answer any press inquiries.

Evan Doherty
Nat. Finance Com
3/8/80

19 de febrero de 1980

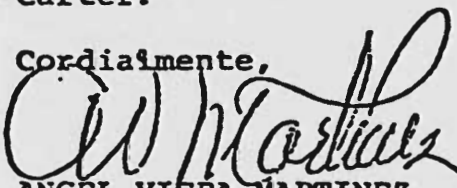
Lic. Manuel Pérez Rodríguez
G.P.O. Box 1512
San Juan, Puerto Rico 00936

Estimado Lic. Pérez Rodríguez:

Se me ha informado que usted preside el grupo denominado "Comité Amigos de Jimmy Carter" para hacer campaña en Puerto Rico para la reelección del Presidente Jimmy Carter.

La formación de ese "Comité Amigos de Jimmy Carter" no está autorizado por el "Carter-Mondale Presidential Committee, Inc." y sus actividades no pueden estar relacionadas en forma alguna con la campaña del Comité Presidencial Carter-Mondale en Puerto Rico.

La campaña del Presidente Carter en Puerto Rico se rige por la Ley Federal de Elecciones y es necesario que se le de cumplimiento estricto a todas las disposiciones de la Ley Federal de Elecciones con relación a la campaña del Presidente Carter.

Cordialmente,

ANGEL VIERA MARTINEZ

cc: Sr. Alberto Jurado

— ENCLOSURE II —

3:4040481655

Advertising

**JOE FRANCO
& ASSOCIATES, Inc.**

CAMARA DE
REPRESENTANTES
PRESIDENCIA

APR 21 1980 Public Relations

April 18, 1980

Mr. Evan S. Dobelle
National Finance Chairman
Carter/Mondale Presidential Committee, Inc.
1413 K Street N. W.
Washington, D. C. 20005

Dear Mr. Dobelle:

We received today partial payment for the invoices previously approved to you dealing with the Carter/Mondale Committee participation in our Presidential Primary in Puerto Rico last March 16.

As you may recall, you approved a total amount of \$63,614.50 after reviewing the different invoices with Mr. Angel Viera Martínez, Carter Campaign Coordinator in Puerto Rico and with Mr. Virgilio Ramos, who was acting as liason for the Carter Campaign with the Governor of Puerto Rico.

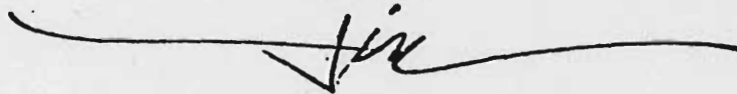
The balance of \$33,614.50 still due belongs to bonafide invoices rendered on behalf of President Carter Campaign in Puerto Rico.

We have made a number of calls to your office and to Donna Sagmiller's office requesting payment in total because as you know, we have already paid the local media involved.

This is a big bill for us to pay when we did our work with maximum effort and dedicated long hours to the campaign. I am sure it is not your intention to withhold payment from us and I would greatly appreciate if you give this matter your personal attention so that your share is fully paid at the earliest convenience.

We thank you for all your help and hope we can serve you again in the future.

Sincerely,



Joe Franco
President

cg
cc Mr. Tim Kraft, National Campaign Manager
Mr. S. Lee Kling
Lcdo. Angel Viera Martínez
Lcdo. Virgilio Ramos

ENCLOSURE III

April 24, 1980

Joe Franco and Associates
1120 Ashford Avenue
San Juan, Puerto Rico 00907

Dear Joe,

I have in hand your letter of April 18, 1980.

With every deference, and documentation and witnesses available, I authorized \$30,010 in expenditures in behalf of the Carter/Mondale Presidential Committee (enclosed).

I received your additional invoices not validated by me and in fact in force before I ever came to Puerto Rico, for the sake of bringing them to the attention of Angel Viera Martinez and Donna Sagemiller.

I apologize for the inability to reach me personally due to my extensive travel and I hope this letter finds you and your colleagues well.

I appreciate the kindness and professionalism extended to me during my stay on the Island.

My very best wishes.

Sincerely,



Evan S. Dobelle
National Finance Chairman

ENCLOSURE IV

Advertising

JOE FRANCO & ASSOCIATES, Inc.

Public Relations

May 22, 1980

Mr. Evan Dobelle, National Finance Chairman
CARTER-MONDALE PRESIDENTIAL-COMMITTEE, INC.
P.O. Box 500
Washington, D.C. 20044

Dear Mr. Dobelle:

I hereby acknowledge your letter of April 24, 1980 addressed to our President, Mr. Joe Franco, responding to our various requests for settlement of the total outstanding debt of \$63,624.50, due us for services and expenditures on behalf of the local Carter-Mondale Presidential Primary held here last March.

I surely do not understand the meaning and implications contained in the third paragraph of your letter, whereby you refuse to validate various invoices against your account worth \$33,614.50.

The total package for services rendered, worth \$63,624.50, was discussed and accepted by you for immediate payment (within a week) at the meeting held in our Conference Room, in the presence of Mr. Virgilio Ramos, Esq., liaison for Governor Romero Barceló; Mr. Viera Martínez, Esq., Local Campaign Coordinator for Carter-Mondale and Miss Irma Gómez, our General Manager. You did take those invoices back with you to Washington.

We have furtherly discussed this matter with Messrs. Ramos and Viera Martínez and they both feel surprised at the apparent decision of both you and the Carter Mondale Presidential Committee of not honoring said outstanding debt. They surely do not understand your intentions noting that more than \$170,000 were raised locally for the Carter-Mondale campaign.

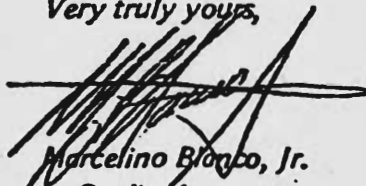
For us, as an advertising agency, this overall outstanding balance has dealt a heavy blow to our "cash flow" and our credit reputation with our local media. Beside your problem, we must also face the fact that your local Friends of Jimmy Carter organization has been unable to raise enough funds to cover the debt owed us. Total outstanding debt of Friends of Jimmy Carter Committee as of now still remains well over \$163,000, for advertising and printings on behalf of President Carter during the Puerto Rico Presidential Primary of March 16th.

ENCLOSURE V

The Carter Campaign in Puerto Rico was a difficult one for us, since it is well known that the Kennedy people managed to raise locally well over \$400,000 that were pumped into a sophisticated campaign against us. Being aware of the importance of a Carter victory here before the Illinois Primary, this agency didn't hesitate to use all available resources of our own to win this very important victory.

We surely hope that our dedication and our efforts beyond the normal call of duty of an advertising agency, be duly compensated with at least payment of these expenses that were legitimately honored to the media from our resources.

Very truly yours,



Marcelino Blanco, Jr.
Credit Manager

cc: Mr. Virgilio Ramos, Esq.
Mr. A. Viera Martínez, Esq. ✓

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24440

Bcc# 8272

Manuel M. Perez Rodriguez

ABOGADO-NOTARIO

ATTORNEY AT LAW

403 DEL PARQUE, SUITE 900

SANTURCE, STOP 23

SAN JUAN, PUERTO RICO 00912

809-7244440

August 6, 1982

2 AUG 16 P4:22

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1354

Dear Mister Gross:

Please find enclosed my answer under oath to the
questionnaire you send me on May 20, 1982. I hope the
information contained in my reply to your questions will be of
value to you.

Sincerely,

Manuel M. Perez Rodriguez
MANUEL M. PEREZ RODRIGUEZ

MPR:chc

84040481660

-SWORN STATEMENT-

I, MANUEL M. PEREZ RODRIGUEZ, of legal age, married, Lawyer and resident of San Juan, Puerto Rico duly sworn depose:

a) That my name and personal circumstances are above stated.

b) That my answer under oath to the 25 questions you send me is as follows:

1. I was President of Comité Amigos De Jimmy Carter.
2. I was a volunteer, as a bonafide Democrat. There was not to much work to do as Chairman of the Comité Amigos De Jimmy Carter, because the campaign was mainly field work; but Mr. Jurado and I met when necessary for the approval of the Publicity Agency Work, although we almost relied on its judgement. It was about one and a half month campaign, more or less.
3. I don't have a list of workers of Comité Amigos De Jimmy Carter. There were no paid workers, all were volunteers all over the Island.
4. Joe Franco and Associates.
5. Adalberto Jurado and myself.
6. Joe Franco and Associates because we relied entirely on their political Campaign expertise. They have managed the Political Campaign account for many Political Candidates. In my opinion he is the best in this type of work.
7. I have never discussed campaign issues with officers, members or agents of the Carter-Mondale Committee.
8. Yes, Comité Amigos De Jimmy Carter wrote to Atty. Angel Viera Martinez informing him the establishing of Comité Amigos De Jimmy Carter and we received a letter from him on which he, as President Carter's Campaign coordinator in Puerto Rico told me that Comité Amigos De Jimmy Carter was not authorized by Carter-Mondale Presidential Committee and that all our activities could not be related in any way with them.
9. No.
10. No.

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11. I met several times with Mr. Joe Franco but he never discussed the Carter-Mondale Comittee Plans, nor were representatives of Carter-Mondale Comittee present at the meetings I had with Joe Franco.
12. Joe Franco knew from the beginning that Comité Amigos De Jimmy Carter was completely separate and had nothing to do with the Carter-Mondale Presidential Committee, and our committee contracted his services on a separate credit account basis.
13. I met on several ocassions with Mr. Jurado and Joe Franco to discuss and approve media proposals.
14. No to my recollection.
15. No to my recollection.
16. There was no one else besides Joe Franco involved in the development of the media proposals for Comite Amigos De Jimmy Carter.
17. We relied in the experience and good judgement of Joe Franco who has prepared all the publicity for many political cam paigns in Puerto Rico. He looked for the necessary materials.
- 17a. No
18. I didn't have access to any information related to the Carter-Mondale strategy and or contract with Joe Franco & Associates.
19. A) I don't know the following persons:
- a) Mr. Terry O'Connell
 - b) Mr. Evan S. Dobelle
 - c) Mr. Bob Keefe
- B) I have known for serveral years Atty. Angel Viera Martínez who use to live with his family in the same condominium where I live.
20. No, he never explained the strategy, text, development or ideas pertanining to the Carter-Mondale purchases.
21. I have known Joe Franco for over six years and our relation up to the Amigos De Jimmy Carter's Campaign was only social and political. We belong to the same local political party "New Progressive Party", the party in power now.

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MEMOR

22. I don't have any documents under my custody. This was a very short campaign done by volunteers and everything was carried on a very informal way.
23. I don't have any samples of radio texts and/or T.V. spots or other campaign related material in my custody.
24. a) I don't have any copies of correspondence, memoranda, etc., of Comité Amigos De Jimmy Carter under my custody.
b) I don't keep telephone logs in my office.
c) I did not prepare minutes of my meetings with Joe Franco, they were very informal meetings.

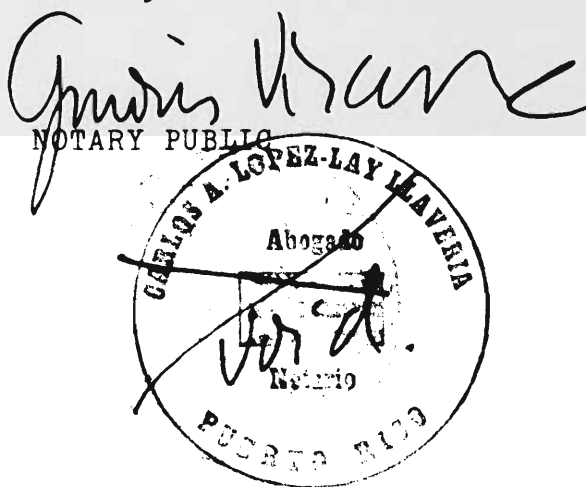
Amigos De Jimmy Carter Committee was organized and existed for a very short period of time. In Puerto Rico, we don't vote for the President and locally with the Presidential Primary (march 16, 1980) everything was over.

In San Juan, Puerto Rico, this 6th. day of August, 1982.

Manuel M. Perez Rodriguez
MANUEL M. PEREZ RODRIGUEZ

Affidavit Number 4359

Sworn and subscribed by Mister Manuel M. Pérez Rodriguez of the personal circumstances above stated, personally known to me this 6th. day of August, 1982.



840404817663



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

August 2, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Angel Viera Martinez
P.O. Box 2483
San Juan, Puerto Rico 00903

RE: MUR 1354

Dear Mr. Martinez:

3 4 0 4 0 4 8 1 6 6 4
The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order which requires you to provide certain information has been issued. The Commission does not consider you a respondent in this matter, but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within five days of your receipt of this order. A franked, special delivery envelope is enclosed to expedite receipt of your responses. Failure to respond to this order may result in the Commission filing a civil action against you.

Letter to Angel Viera Martinez
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Order
Questions

34040481655


1354 - Callahan 8/2

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 DELIVERED TO:
Angel Viera Martinez
P.O. Box 2483
San Juan, P.R. 00903

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFICATE NO. RETURNED NO.
92138

(Always obtain signature of addressee or agent)

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


4. DATE OF DELIVERY
AUG 13 1982

5. ADDRESS (Complete only if changed)

6. UNABLE TO DELIVER REASON

U.S. MAIL
AUG 13 1982
U.S. MAIL

2025 : 1070-550-000

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1354
Comite Amigos de Jimmy)
Carter)
Carter-Mondale)
Presidential Committee)

ORDER TO SUBMIT WRITTEN ANSWERS

TO: Angel Viera Martinez
P.O. Box 2483
San Juan, Puerto Rico 00903

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within five days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 30th day of July , 1982.


Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

84040181666

QUESTIONS FOR ANGEL VIERA MARTINEZ

1. State your position with the Carter-Mondale Presidential Committee ("the Committee").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Committee's campaign activities in Puerto Rico, separated as to paid and volunteer workers.
4. Who was in charge of media activities for the Committee in Puerto Rico?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Committee.
6. What individual(s) made final decisions regarding campaign strategy in Puerto Rico?
7. When did you have knowledge of the existence of the Comite Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign?
8. To your knowledge, when did other Committee agents become aware of the existence of the Comite Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign? Please detail your response.
9. Did you ever have any conversations with anyone connected in any way with the Comite Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
10. Did you ever correspond in writing with anyone connected in any way with the Comite Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
11. To your knowledge, did anyone connected with the Comite request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
12. Did you supply pictures, statistics, texts or any other materials whatever to either (a) Comite Amigos directly or (b) to Joe Franco and Associates for use in media production for Comite Amigos? Please detail your response.

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- 8 4 0 4 0 4 3 1 6 6 3
13. To your knowledge, did any committee agents supply pictures, statistics, texts or any other materials whatever to either (a) Comite Amigos directly or (b) to Joe Franco and Associates for use in media production for Comite Amigos: Please detail your response.
 14. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which Adalberto Jurado and/or Manuel Rodriguez or any other agent of Comite Amigos was present? Please detail your response.
 15. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Comite Amigos or their plans were discussed, regardless of whether an Amigos representative was there? Please detail your response.
 16. Did you ever correspond with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comite Amigos was discussed? Please detail your response.
 17. Did you ever have any conversations with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comite Amigos was discussed? Please detail your response.
 18. Please provide the following documents:
 - (a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (b) Contemporaneous memoranda, including telephone logs, daily calendars, desk diaries, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings, including notes taken by anyone in attendance at said meetings, with Joe Franco and Associates including the names of those in attendance at each meeting.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO:

CHARLES STEELE
GENERAL COUNSEL

FROM:

MARJORIE W. EMMONS/JODY C. RANSOM *MWE* *JCR*

DATE:

JULY 30, 1982

SUBJECT:

SUBPOENA REGARDING MUR 1354

34043491667
The attached subpoena in MUR 1354, which was
Commission approved on July 29, 1982 by a vote of
5-0, has been signed and sealed this date.

Attachment:

Subpoena - Martinez



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Angel Viera Martinez
P.O. Box 2483
San Juan, Puerto Rico 00903

RE: MUR 1354

Dear Mr. Martinez:

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The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order which requires you to provide certain information has been issued. The Commission does not consider you a respondent in this matter, but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

8
You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within five days of your receipt of this order. A franked, special delivery envelope is enclosed to expedite receipt of your responses. Failure to respond to this order may result in the Commission filing a civil action against you.

Letter to Angel Viera Martinez
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Smey
7/28/82

Enclosure
Order
Questions

84040481671

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Comite Amigos de Jimmy)
Carter)
Carter-Mondale)
Presidential Committee)

MUR 1354

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on July 29, 1982, the Commission approved by a vote of 5-0 the Order to be sent to Mr. Angel Viera Martinez as submitted with the Memorandum to the Commission dated July 26, 1982.

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

Attest:

7-29-82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

7-26-82, 3:04
7-27-82, 11:00

34040481672

July 26, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1354

Please have the attached Memo to the Commission
distributed to the Commission on a 48 hour tally basis.

Thank you.

Attachment

cc: Callahan

34040481675



SENSITIVE

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

82 JUL 26 P 3: 04

July 26, 1982

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

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

SUBJECT: Order to Answer Questions - MUR 1354

At issue in this matter is whether expenditures made on behalf of the Carter-Mondale Committee by the Comite Amigos de Jimmy Carter were independent within the meaning of the Act. The Commission has previously found reason to believe that:

- (a) The Comite Amigos violated 2 U.S.C. § 433, § 434 and § 441b;
- (b) The Carter-Mondale Committee violated 2 U.S.C. § 433, § 434, § 441a(b) and § 441b; and
- (c) Joe Franco and Associates violated 2 U.S.C. § 441b.

Both Joe Franco and Comite Amigos have twice been issued orders to answer questions in connection with this MUR.

Adalberto Jurado, treasurer of Comite Amigos, responded most recently by stating that he could not provide information as to the development and production of political advertisements. Therefore, on May 20, 1982, interrogatories were sent to all officers of Comite Amigos. Responses were received from the president and vice president; we have been informed that the secretary is now deceased.

Joe Franco's responses to our orders as well as our follow-up questions directly contradict the Carter Committee's contention that no substantive contact occurred between the principal committee and Comite Amigos on the subject of media purchases. Therefore, on May 20, 1982, Mr. Franco and all

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officers of the Carter Committee named by him were sent interrogatories.

On July 13, 1982, Douglas Huron, counsel to the Carter-Mondale Committee, submitted affidavits from:

- (a) Evan S. Dobelle, National Finance Chairman;
- (b) Terry O'Connell, Coordinator for campaign in Puerto Rico; and
- (c) Bob Keefe, National Finance Committee.

In his transmittal letter, Mr. Huron states that he represents the Carter Committee only and does not represent any of the above-named individuals, even though they were agents of the Committee.

The only response not received to our interrogatories was sent through Mr. Huron to Angel Viera Martinez, the local campaign coordinator in Puerto Rico for the Carter Committee. Mr. Huron states that Martinez' position with the Committee was unofficial. Martinez has contacted Mr. Huron on two occasions stating that he eventually plans to respond to our questions but has not committed himself to a specific date. Because Mr. Martinez's responses are essential to our analysis of this matter, it is recommended that the Commission order him to answer the attached interrogatories.

At this time, we believe there is the need for further investigation in this matter. With the information at hand, depositions will be necessary because the Carter-Mondale Committee's assertions concerning independence have consistently been refuted by Joe Franco's responses. The testimony by both Franco and Martinez will be critical in the completion of our investigation. However, we do not recommend depositions at this stage of our inquiry as it will be to our advantage to first gain the requested background information for use in preparation for depositions.

Recommendation

Approve attached Order to be sent to Mr. Angel Viera Martinez.

Attachments

Proposed Order
Proposed Questions
Notification Letter
(5 total pages attached)

84040431675

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
) MUR 1354
Comite Amigos de Jimmy)
Carter)
Carter-Mondale)
Presidential Committee)

ORDER TO SUBMIT WRITTEN ANSWERS

TO: Angel Viera Martinez
P.O. Box 2483
San Juan, Puerto Rico 00903

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within five days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this day of , 1982.

Frank P. Reiche, Chairman
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

84040481676

/

QUESTIONS FOR ANGEL VIERA MARTINEZ

1. State your position with the Carter-Mondale Presidential Committee ("the Committee").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Committee's campaign activities in Puerto Rico, separated as to paid and volunteer workers.
4. Who was in charge of media activities for the Committee in Puerto Rico?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Committee.
6. What individual(s) made final decisions regarding campaign strategy in Puerto Rico?
7. When did you have knowledge of the existence of the Comité Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign?
8. To your knowledge, when did other Committee agents become aware of the existence of the Comité Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign? Please detail your response.
9. Did you ever have any conversations with anyone connected in any way with the Comité Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
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11. To your knowledge, did anyone connected with the Comité request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
12. Did you supply pictures, statistics, texts or any other materials whatever to either (a) Comité Amigos directly or (b) to Joe Franco and Associates for use in media production for Comité Amigos? Please detail your response.

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13. To your knowledge, did any committee agents supply pictures, statistics, texts or any other materials whatever to either (a) Comite Amigos directly or (b) to Joe Franco and Associates for use in media production for Comite Amigos: Please detail your response.
14. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which Adalberto Jurado and/or Manuel Rodriguez or any other agent of Comite Amigos was present? Please detail your response.
15. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Comite Amigos or their plans were discussed, regardless of whether an Amigos representative was there? Please detail your response.
16. Did you ever correspond with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comite Amigos was discussed? Please detail your response.
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 - (b) Contemporaneous memoranda, including telephone logs, daily calendars, desk diaries, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings, including notes taken by anyone in attendance at said meetings, with Joe Franco and Associates including the names of those in attendance at each meeting.

84740431673

3



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Angel Viera Martinez
P.O. Box 2483
San Juan, Puerto Rico 00903

RE: MUR 1354

Dear Mr. Martinez:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order which requires you to provide certain information has been issued. The Commission does not consider you a respondent in this matter, but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. § 437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within five days of your receipt of this order. A franked, special delivery envelope is enclosed to expedite receipt of your responses. Failure to respond to this order may result in the Commission filing a civil action against you.

4

Letter to Angel Viera Martinez
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4529.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Order
Questions

84040491680

5

202070

GCC# 8114

STEIN & HURON

1619 NEW HAMPSHIRE AVENUE, N. W.

WASHINGTON, D. C. 20009

DOUGLAS B. HURON
EILEEN M. STEIN

(202) 797-3880

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-9220

July 13, 1982

30 JUL 16 P2:15

Suzanne Callahan, Esquire
Office of the General Counsel
Federal Election Commission
1325 K Street, NW
Washington, DC 20005

re: MUR 1354

Dear Ms. Callahan:

Enclosed are the affidavits which you have requested from Evan Dobelle, Robert J. Keefe and Terry O'Connell. As I have informed you, I do not represent any of these gentlemen; nor do I represent Angel Viera Martinez, although I have forwarded your request to him.

The enclosed affidavits confirm that the Carter/Mondale Presidential Committee, Inc. in no way encouraged any independent activities during the presidential primary campaign in Puerto Rico. I would hope that this matter can now be closed.

Sincerely,



Douglas B. Huron

cc: Evan Dobelle
Robert J. Keefe
Terry O'Connell
Angel Viera Martinez

84040431631

A F F I D A V I T

DISTRICT OF COLUMBIA)
) SS:

ROBERT J. KEEFE being first duly sworn deposes and says that in response to certain questions submitted to him for response by the Federal Election Commission, states that at no time during said period covered by any of the questions submitted, was he in the Commonwealth of Puerto Rico; that he attended no meetings nor knows of any facts regarding the subject matter of the 18 questions submitted; that he has no knowledge whatsoever concerning or regarding an organization, agency, or committee by the name of Comite Amigos de Jimmy Carter; that he had no conversation or communication in any form with Joe Franco regarding any of the subject matter contained in the 18 questions.

FURTHER, affiant says not.


ROBERT J. KEEFE

SWORN and subscribed before me
this 14th day of June, 1982.


Notary Public

My Commission Expires:

My Commission Expires May 14, 1983

32 JUL 16 P 2: 15

COMM. COUNCIL

34040481632

RESPONSES OF TERRY O'CONNELL TO FEC INTERROGATORIES

Terry O'Connell makes the following responses to the interrogatories submitted by the Federal Election Commission on May 20, 1982:

1. I was a volunteer for the Carter/Mondale Presidential Committee, Inc. in Puerto Rico. I had no official title. I arrived on the island in early January 1980 and departed on March 17, 1980. I spent most of this two-month period in Puerto Rico but returned to the continental United States on a few occasions.

2. I served as a representative of the Carter/Mondale Committee in its dealings with the governor and the New Democratic Party of Puerto Rico.

3. The only individuals' names I can recall who worked for the Carter/Mondale Committee in Puerto Rico are Angel Viera Martinez, Evan Dobelle and Terry McAuliffe. I do not know whether they were paid employees of the Committee.

4. To the best of my knowledge, Evan Dobelle was the person who was in charge of authorizing media expenditures for the Carter/Mondale Committee in Puerto Rico. I believe that Joe Franco was the individual who actually produced and placed media for the Carter/Mondale Committee in Puerto Rico.

5. I was not authorized to negotiate media expenditures on behalf of the Carter/Mondale Committee. I believe that Evan Dobelle was so authorized.

3404048163

3 JUL 1982 15

6. Final decisions on campaign strategy were made at the Washington headquarters of the Carter/Mondale Committee.

7. To the best of my knowledge, I learned of the existence of Komite Amigos de Jimmy Carter during the latter part of February 1980.

8. I do not know when others associated with the Carter/Mondale Committee became aware of Komite Amigos.

9. To the best of my knowledge, I did not have any conversations with anyone connected with Komite Amigos.

10. To the best of my knowledge, I did not correspond in writing with anyone connected with Komite Amigos.

11. To the best of my knowledge, no one connected with Komite Amigos requested authorization from the Carter/Mondale Committee to place media advertising.

12. To the best of my knowledge, I did not supply any materials to Komite Amigos, either directly or indirectly through Joe Franco, for use in media production.

13. I know of no agents for the Carter/Mondale Committee who supplied materials to Komite Amigos, either directly or indirectly through Joe Franco, for use in media production.

14. I met a number of people in Puerto Rico during the course of the primary campaign, but I do not recollect ever meeting Adalberto Jurado or Manuel Rodriguez. Since I do not recall meeting either of these gentlemen, I cannot say for certain that I was never in their presence. I can say, however, that I

3404031634

was never present at any meeting at which joint activities of the Carter/Mondale Committee and Comite Amigos were planned or discussed.

15. To the best of my knowledge, I was never present at any meeting with Joe Franco at which the activities of Comite Amigos or their plans were discussed. I recall being introduced to Franco at a state committee meeting in mid or late January 1980. Among other things, there was a discussion at that meeting concerning the amount of money which would be available from national campaign headquarters to finance the Carter/Mondale effort in Puerto Rico. Some of the people at the meeting said that there might not be sufficient money to finance necessary activities, and someone -- I do not recall who -- asked whether individuals could raise or spend their own money. I explained in as much detail as possible that any such activities had to be entirely independent of, and separate from, the Carter/Mondale campaign and that strict adherence to all Federal election rules and regulations was required. I did not directly or indirectly encourage anyone to start an independent campaign. I later obtained a copy of the Federal Election Campaign Act and gave it to Angel Viera Martinez, who was subsequently named Chair of the local Carter/Mondale campaign.

16. To the best of my knowledge, I did not have any correspondence with Joe Franco or his agents concerning the necessity for separate accounts for the Carter/Mondale Committee and Comite Amigos.

17. As I indicated in paragraph 15, I attended one meeting in January at which Joe Franco was present and at which I explained the FEC rules regarding independent committees. Later I learned that Franco was handling advertising for the Carter/Mondale Committee, Comite Amigos and several nonfederal races at the state and local levels. I told several people that I wanted to be sure that it was clear to everyone that the work Franco was doing for Comite Amigos was entirely separate from his work for the Carter/Mondale Committee. I do not remember talking to Franco in this regard but I would have done so if I had the opportunity. I was concerned that it be clear that the Carter/Mondale Committee was totally independent from Comite Amigos not only because of FEC rules but also because I strongly disapproved of some of the things Comite Amigos was doing. I did not want anyone to be able to suggest that Carter/Mondale was in any way responsible for Comite Amigos' activities.

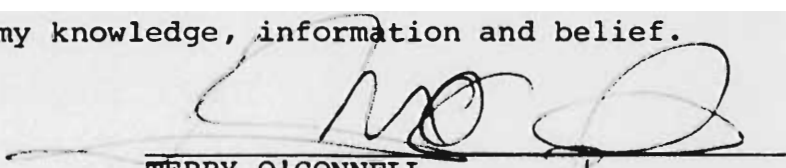
18. I have no documents relating to the matters described in this interrogatory.

WASHINGTON)

DISTRICT OF COLUMBIA)

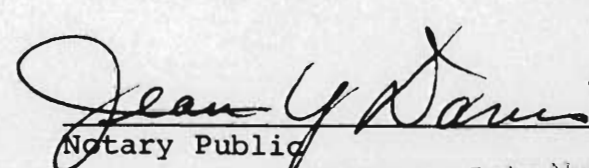
ss:

I hereby certify that the foregoing responses are true and accurate to the best of my knowledge, information and belief.


TERRY O'CONNELL

Subscribed and sworn to before me this 7th day of

July, 1982.


Notary Public

My Commission Expires May 15, 1983

34340-131635

AFFIDAVIT

COUNTY OF BERKSHIRE)
 STATE OF MASSACHUSETTS)

ss:

EVAN S. DOBELLE, being duly sworn, deposes and says:

I hereby make the following answers to certain questions proposed by the Federal Election Commission in connection with MUR 1354:

1. I was the National Finance Chairman of the Carter/Mondale Presidential Committee, Inc. I went to Puerto Rico in early March 1980 and was there for a total of about ten days to two weeks immediately prior to the presidential primary election. I left the island the day after the election.

2. My principal duties as National Finance Chairman were to raise money for the Carter/Mondale Committee. In Puerto Rico, however, I served as liaison between the Carter/Mondale Committee in Washington and the governor's office.

3. While I was in Puerto Rico, the only Carter/Mondale personnel present were one of my staff members, Terrence McAuliffe, and me. The local campaign was chaired by Angel Viera Martinez. I believe that Viera recruited volunteers from his political party.

4. To the best of my knowledge, Joe Franco was the individual who produced and placed media advertising for the Carter/Mondale Committee in Puerto Rico. While I was on the island, I had authority to authorize media purchases for the Committee within the limitations of the campaign budget which was set in Washington.

5. I know of no one other than myself who was authorized to negotiate media expenditures in Puerto Rico on behalf of the Carter/Mondale Committee. My knowledge is limited to the final two weeks of the campaign.

6. To the best of my knowledge, the final decisions on campaign strategy in Puerto Rico were made by the national

campaign staff in Washington.

7. I learned of the existence of Comit  Amigos shortly after I arrived in Puerto Rico. I never knew in advance of any of its proposed activities.

8. I do not know when anyone else associated with the Carter/Mondale Committee became aware of the existence of Comit  Amigos.

9. To the best of my knowledge, I never had any conversations with anyone connected with Comit  Amigos. I knew that Joe Franco was handling media for Comit  Amigos as well as for the Carter/Mondale Committee, but I never had any discussions with Franco concerning the work he was doing for Comit  Amigos.

10. To the best of my knowledge, I never corresponded in writing with anyone connected with Comit  Amigos. I did write a note to Joe Franco which emphasized the point that there was no connection between our campaign and Comit  Amigos. A copy of the note that I wrote was attached to materials already submitted to the Commission.

11. To the best of my knowledge, no one connected with Comit  Amigos requested authorization from the Carter/Mondale Committee to place any media advertising.

12. To the best of my knowledge, I never submitted any pictures or other materials to Comit  Amigos for use in media production; nor did I give any such materials to Joe Franco for use by Comit  Amigos.

13. As far as I know, no one associated with the Carter/Mondale Committee supplied any pictures or other materials to Comit  Amigos for use in media production, and no one associated with our Committee furnished such materials to Joe Franco for use by Comit  Amigos.

14. To the best of my knowledge, I was never present at any meetings involving either Adalberto Jurado or Manuel Rodriguez. I do not recall meeting either individual, and their

names are not familiar to me. If anyone whom I met was associated with Comite Amigos in any way, I was never informed of this.

15. To the best of my knowledge, I never attended any meetings at which the activities or plans of Comite Amigos were discussed.

16. I do not recall ever having corresponded with Joe Franco or his agents concerning the necessity of maintaining separate accounts for the Carter/Mondale Committee and Comite Amigos.

17. To the best of my knowledge, I never had any conversations with Joe Franco or his agents concerning the necessity of maintaining separate accounts for the Carter/Mondale Committee and Comite Amigos.

18. The only memorandum with which I am familiar which dealt in any way with Comite Amigos has already been furnished to the Commission. See paragraph 10 above.


EVAN S. DOBELLE

Subscribed and sworn to before me this *1st* day of

July, 1982.


Notary Public

My Commission expires

November 14, 1986

202119
GCC# 8135

BUFETE DE
MELLENDEZ PEREZ & RODRIGUEZ BIGAS
EDIFICIO EL CARIBE, PISO 14
AVENIDA LAS PALMERAS
SAN JUAN, PUERTO RICO

ERNESTO A. MELLENDEZ PEREZ
LUIS RODRIGUEZ BIGAS

TEL. (809) 725-2222
APARTADO 5072
OFICINA POSTAL GENERAL
SAN JUAN, PUERTO RICO 00936

July 12, 1982

Ms. Suzane Callahan
Federal Election Commission
Washington, D. C. 20463

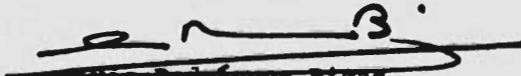
RE: MUR 1354

Dear Ms. Callahan:

Enclosed please find notarized answers prepared by Joe Franco to the questions sent by the Federal Election Commission on May 30, 1982. Sorry that these answers were not prepared earlier.

Thanks for your patience.

Very truly yours,


Luis Rodriguez Bigas

LRB/nm
Enc.

34040431690

JUL 20 P 4: 34

OFFICIAL CORRESPONDENCE

JUL 20 1982 6: 34

QUESTIONS FOR JOE FRANCO

1. In your response of May 5, 1982, to question 1(a), you state in part,

"Bob Keefe - Contacted us personally"

Does this mean Bob Keefe initiated contact with you? How?

2. Did you or any other representative of Joe Franco and Associates ever personally meet with Mr. Keefe in Puerto Rico? Anywhere else?
3. Were any notes, tape recordings or minutes of any kind taken during any meetings whatsoever held between representatives of Joe Franco and Associates and either (a) representatives of the Carter-Mondale Presidential Committee and/or (b) representatives of Comit  Amigos de Jimmy Carter?
4. Were any duplicate films, TV spots, brochures, written advertisements or any other media productions for the Carter campaign used by both Comit  Amigos and the Carter-Mondale Committee. Please be specific in your response.
5. In your response of May 5, 1982, to question 2, you state in part,

As we informed before, the accounts for the Carter-Mondale Committee and Comit  Amigos de Jimmy Carter were to be kept separate in our billings but the advertising strategy, media placing, decisions as to advertising productions, were ordered and/or taken by the same people. (Emphasis added)

By whom were you told of the arrangement to keep the billings separate? What reason was given? Please give specific details.

6. What individual(s) advised you as to whether the billing for a particular purchase should be billed to the account of Comit  Amigos or Carter-Mondale? Please be specific.
7. From whom did you receive materials used in design and preparation of media productions for Comit  Amigos? i.e., statistics, quotes, photos, etc.

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1. He visited Puerto Rico and thru the local Carter-Mondale Committee people contacted us by phone & then visited us.

2. Yes. I myself met with him in Puerto Rico. No.

3. No minutes were taken of these meetings with any of these 2 groups. These I transaction with these people. These transactions with these people running the Carter-Mondale in Puerto Rico was conducted in a very informal manner. With instructions and approval of the different subjects of the campaign given personally at the meeting held. This was performed in that way, because the Carter-Mondale company in the Puerto Rico Primary was assigned to us due to our relationship with Mr. Angel Viera Martínez, at that time Speaker of the House of Representative of Puerto Rico, and coordinator of the Carter-Mondale campaign in the island; and to the relationship with the Governor of Puerto Rico, Hon. Carlos Romero Barceló, for whom we have done must of his political campaigns.

4. Yes. We prepared material for one campaign & it was used by both committees.

5. The reason for having the Comité de Amigos de Jimmy Carter was solely to raise additional funds since there were limits for expenditures for the Carter-Mondale Committee in Puerto Rico. Those present at our meetings (Angel Viera Martínez, Evan S. Dobelle, Bob O'Keefe, agreed to this).

6. Mr. Evan S. Dobelle & Mr. Angel Viera Martínez as Coordinator of the Carter-Mondale Presidential Committee revised & checked our invoices and decided which were to be billed to each committee.

7. Material was received from the States (thru Carter-Mondale Committee) and from our local people.

In the States our contact were Evan S. Dobelle, Butch James, Bob O'Keefe, locally Mr. Angel Viera Martínez as Coordinator in Puerto Rico.

Joe Franco
President

JF/lmm

affidavit No. 7,294



Subscribed before me by Joe Franco,
Legal age, married, President of Joe
Franco & Associates, Inc. and resident
of San Juan, Puerto Rico, to me personal-
ly in San Juan, Puerto Rico on

Luis Rodríguez Bargas
Notary Public

666 8073

RECEIVED

Clarita Alfonso

G. P. O. Box 1177

02 JUL 7 AM: 01

San Juan, P. R. 00936

7 PM: 10

Tel. 767-6113 Residence

June 23, 1982

Federal Election Commission
Washington, D. C. 20463

Gentlemen:

Enclosed please find papers from certified letter addressed to Antonio Alfonso.

I regret to tell you that my husband died in an automobile accident October 24/81.

I am returning your papers since we cannot be of any help.

Respectfully yours,

Clara Luz M. vda. Alfonso
Clara Luz M. vda. Alfonso

Encls.

02 JUL 7 PM: 21

34040481693



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Antonio Alfonso, Secretary
Calle Lila Num 1687
Urb. San Francisco
Rio Piedras, Puerto Rico 00927

RE: MUR 1354

Dear Mr. Alfonso:

On December 14, 1981, Adalberto Jurado, treasurer of Comité Amigos de Jimmy Carter, received notification that the Commission had found reason to believe that the Comité Amigos de Jimmy Carter had violated 2 U.S.C. § 433 and § 441b, provisions of the Federal Election Campaign Act of 1971, as amended. (A copy of the reason to believe notification is enclosed for your reference). An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has prepared the attached questions which are to be answered by you.

It is required that you submit the requested information under oath and that you do so within ten days of your receipt of this notification.

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Reason to Believe Notification
Questions

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82 JUL 7 11:01

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

02 JUL 7 411:01

DATE March 20, 1981

MUR NO. 1354

STAFF MEMBER & TEL. NO.

RESPONDENT Comite Amigos De
Jimmy Carter

Suzanne Callahan

(202) 523-4057

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

SUMMARY OF ALLEGATIONS

On January 28, 1981, the Reports Analysis Division (RAD) referred to the Office of General Counsel, the Comite Amigos De Jimmy Carter ("The Committee") in connection with its failure to file reports of receipts and expenditures in violation of 2 U.S.C. §434a(4).

FACTUAL BASIS AND LEGAL ANALYSIS

ANALYSIS

The Committee registered as an unauthorized committee supporting the candidacy of Jimmy Carter of March 6, 1980. Subsequent to its registration, the Committee filed one report covering March 1 through April 30, 1980.

The report indicates that as of April 30th, the Committee had contracted with Joe Franco & Associates, Inc. for a total of \$218,099.74 in media services, presumably on behalf of President Carter's re-election campaign. Of that amount, \$59,000 has been paid by the Committee and the remaining \$159,099.74 is reported as an outstanding debt. Additionally, the committee reports making \$12,729.32 in independent expenditures.

The Committee was sent non-filer notices in connection with its failure to file the July 15th, October 15th, 12 day pre-general election and 30 day post general election reports on July 22nd, October 22nd, October 29, 1980 and January 23, 1981, respectively. The Committee failed to respond to any of the notices.

Additionally, the committee has failed to file the year end report in violation of §434(a)(4).

While the Committee's detailed Summary Schedule filed with the April 15, 1980 report discloses \$12,729.32 for independent expenditures, it failed to file a corresponding notarized schedule E reporting the particulars of its independent activity in violation of 2 U.S.C. §434(b)(6)(B)(iii).

34740481695

The Committee has also failed to disclose the status of its outstanding debt of \$159,099.74 owed to Joe Franco & Associates in violation of 2 U.S.C. §434(b)(8).

Therefore, the General Counsel recommends that the Commission find reason to believe that respondent has violated 2 U.S.C. §§434(a)(4), 434(b)(6)(B)(iii), and 434(b)(8)

RECOMMENDATIONS:

It is recommended that the Commission:

1. Find reason to believe the Committee violated 2 U.S.C. §434(a)(4);
2. Find reason to believe the Committee violated 2 U.S.C. §434(b)(6)(B)(iii); and
3. Find reason to believe the Committee violated 2 U.S.C. §434(b)(8).

34040481696

QUESTIONS FOR ANTONIO ALFONSO, SECRETARY
COMITE AMIGOS DE JIMMY CARTER

1. State your position with the Comit  Amigos de Jimmy Carter ("the Comit ").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Comit 's campaign activities; please list paid and volunteer workers separately.
4. Who was in charge of media activities for the Comit ?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Comit .
6. What individual(s) made final decisions regarding campaign strategy?
7. Did you ever have any conversations with anyone connected in any way with the Carter-Mondale Committee, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
8. Did you ever correspond in writing with anyone connected in any way with the Carter-Mondale Committee, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
9. To your knowledge, did anyone connected with the Comit  request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
10. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which any representative of the Carter-Mondale Committee was present? Please detail your response.
11. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Carter-Mondale or their plans were discussed, regardless of whether a Carter-Mondale representative was there? Please detail your response.
12. Do you recall any correspondence or conversations with Joe Franco or one of his agents in which the necessity for

84040481697

Questions
Page 2

separate accounts for the Carter-Mondale committee and Comite Amigos was discussed? Please detail your response.

13. Did any officers of Comite Amigos personally meet with you and/or Joe Franco to approve media proposals? Explain.
14. Did you ever personally go to the Carter-Mondale headquarters? (Explain your response in detail and cite specific examples).
15. Do you know if anyone else associated with Comite Amigos ever personally went to the Carter-Mondale headquarters? Explain.
16. Do you know of anyone besides Joe Franco who was involved in the development of the media proposals for Comite Amigos? Please detail your response.
17. State the source of any campaign materials, including photos, strategy proposals, statistics, etc., which you considered in connection with media purchases on behalf of Jimmy Carter.
- 17a. Did you ever receive any campaign materials from anyone connected with Carter-Mondale?
18. Give specific details of what information you had access to concerning the Carter-Mondale contract with Joe Franco and Associates; from whom you received such information, where and when you received the information, and who was present, etc.
19. Please detail your knowledge of the following individuals including whether your relationship was business, social or both; in what capacity you have dealt with the named individuals including dates, times and places; whether your contact(s) with each was (were) in person, via telephone, or correspondence: (Respond to the question for each individual separately)

Mr. Terry O'Connell -

Coordinator for the
Campaign in Puerto Rico,
Washington, D.C.

Mr. Evan S. Dobelle -

National Finance Chair-
man, Carter-Mondale
Presidential Committee,
1413 K Street, N.W.,
Washington, D.C. 20005

84040431693

Mr. Bob Keefe -

National Finance
Committee, Carter-Mondale
Presidential Committee,
1413 K Street, N.W.,
Washington, D.C. 20005

Mr. Angel Viera Martinez -

Attorney of Law,
Coordinator of the
Carter-Mondale local
campaign

20. Did Joe Franco or any of his associates ever mention to you or to your knowledge to any other person connected with Comite Amigos the strategy, text, development or ideas pertaining to the Carter-Mondale media purchases? Explain your response in detail. Cite examples.
21. State your relationship with Joe Franco. How long have you known him? Is your relationship business, social or both?
22. Identify by list, in detail, all Committee records, including: any financial records, bank records, correspondence, media text and any other documents whatever in connection with Comite Amigos activities which are available for Commission inspection with the exception of the invoices from Joe Franco and Associates which have previously been submitted to the Commission by Adalberto Jurado.
23. Submit examples of texts of radio and TV spots and other campaign related materials which Comite Amigos purchased on behalf of Jimmy Carter.
24. Please provide the following documents:
- (a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings with Joe Franco and Associates including the names of those in attendance at each meeting.

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RECEIVED

82 JUN 15 AM: 53
GCC# 7957

Manuel M. Perez Rodriguez

ABOGADO-NOTARIO
ATTORNEY AT LAW
403 DEL PARQUE, SUITE 400
SANTURCE, STOP 23
SAN JUAN, PUERTO RICO 00912

809-723-9555
721-4440

June 11, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Kenneth A. Gross
Associate General Counsel
Federal Election Commission
Washington D.C. 20463

Re: MUR 1354

Dear Mr. Gross:

I have received your certified letter dated May 20, 1982 which included a General Counsel's Factual and Legal Analysis for the case of reference and 24 questions to be answered under oath.

Due to my multiple occupations, I have not been able to review the 24 questions you have send me in order to answer them.

I will need at least until the end of June to be able to answer your questions, therefore I request you extend the time given to answer your 24 questions until June 30, 1982.

Thanking you in advance for your cooperation, I remain,

Sincerely,

Manuel M. Perez Rodriguez

MANUEL M. PEREZ-RODRIGUEZ

MPR:chc

2 JUN 15 PM 4:22

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RECEIVED
GCC#7956
82 JUN 15 P3:08

12 JUN 15 P4:22

GENERAL COUNCIL

June 4, 1982

Mrs. Suzanne Callahan
Federal Election Commission
Washington, D. C. 20463

RE: MUR 1354

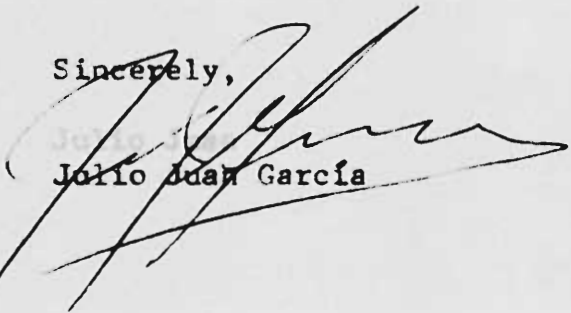
Dear Mrs. Callahan:

Before I answer your questionnaire concerning the Comité Amigos de Jimmy Carter, I wish to make clear that to the best of my knowledge I was never a member of the afore mentioned committee.

Furthermore, I have never exercised the duties of Vice President of the Committee, nor have I taken an active part in its activities. I have never met Mr. Jurado whom you say is the committee's treasurer.


I will now try to answer your questionnaire for the record.

Sincerely,


Julio Juan García

Affidavit Núm. 2336

Jurado y Suscrito ante mí por Julio Juan García de las circunstancias personales antes expresadas, a quienes hoy 16 de conocer personalmente en San Juan, Puerto Rico hoy día 7 de JUNIO de 1982


Manuel M. Pérez Rodríguez
Notario Público



349431701

Answers

Page 1

- 1- I do not have a position on the Comité Amigos de Jimmy Carter.
- 2- Since I was not a member of the Committee, I never exercised the duties of the Vice President.
- 3- I do not know who worked for the Committee.
- 4- I do not know who was in charge of media activities.
- 5- I do not know what persons were authorized to negotiate with the media on behalf of the Committee.
- 6- I do not know the individual (s) who made the final decisions.
- 7- I had no conversations with any of the persons of the Carters Committee.
- 8- I have never corresponded with anyone on the Carter Mondale Committee.
- 9- I can not answer because I was not part of the Committee.
- 10- No
- 11- I was never present at any meetings with Mr. Franco and representatives of Carter Mondale.
- 12- I can not answer this questions, refer to answer (11)
- 13- No
- 14- I have never been to the Carter Mondale Headquarters.
- 15- No
- 16- No
- 17- None
- 17a. No
- 18- I have never had any information about a Carter-Mondale contact with Joe Franco.



Answers

Page 2

19- Mr. Terry O'Connell ---- I do not know him.

M Mr. Evans E. Dobelle --- I do not know him.

Mr. Bob Keefee ---- I do not know him.

Mr. Angel Viera Martínez --- I have talked to him on two or three occasions, but in his role as Vice President of P. N. P... He has also written to me asking for donations for the P. N. P..

20- No

21- I met Mr. Franco about 6 years ago. During this time I have seen him ~~five or six times~~, but ~~on a social basis~~.

22- I can not answer this question, because I was never a member of that committee.

23- Same answer as 22

24- I have no record what so ever of the afore named Committee.

Affidavit Núm. 2337

Jurado y Suscrito ante mí por Julio Juan
Quian --- de las circunstancias
personales antes expresadas a quien(es) doy fe de
conocer personalmente en San Juan, Puerto Rico
hoy día 7 de Junio --- de 19 82.

no

Manuel M. Perez Rodriguez
Notario Público



84040481703

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CCH 7918

82 JUN 7 P2:48

STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

DOUGLAS B. HURON
EILEEN M. STEIN

(202) 797-3680

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-0220

JUN 8 P4:14
RECEIVED

June 4, 1982

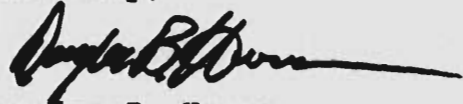
Kenneth A. Gross, Esquire
Associate General Counsel
Federal Election Commission
Washington, DC 20463

re: MUR 1354

Dear Mr. Gross:

We have received your letter asking that certain questions concerning this matter be answered by Terry O'Connell, Robert Keefe, Evan Dobelle and Angel Viera Martinez. I have forwarded copies of the questions to each of these gentlemen. Our committee cannot control the time they need to respond, but our hope is to be able to furnish responses for Messrs. O'Connell, Keefe and Dobelle in the near future. I cannot make any representations concerning the timing of Mr. Viera's response.

Sincerely,


Douglas B. Huron

84040431704

MEMORANDUM TO THE FILE

FROM: Kenneth A. Gross
Associate General Counsel

RE: MURs 1284, 1361 and 1389
and Chinese Waiters MUR
and Puerto Rico MUR
(Comite Amigos 1354)

Doug Huron called me on June 3, 1982 to express his dismay over the Commission's findings in the Chinese waiters MUR. He also indicated that he is going to be submitting a letter saying he's going to be asking for more time to respond to the request in the Puerto Rico case because he has no control over when these individuals will respond and he expressed some concern over whether he would be representing these people. But he will pass the affidavits or the request of the Commission along within the time frame but he probably going to submit a letter to that affect.

As far as the Chinese waiters are concerned he doesn't know what course of action he going to take but needless to say he feels the findings are off the wall. He is also not to ~~support~~ ^{disposed} to reach any arrangement in any other MUR because of the status of the Chinese waiters case. He said that Gary Johnsen was trying to get a hold of him in order to arrange a meeting and I told him that I did not know whether a meeting was worthwhile in light of his posture on the Chinese waiters case and that I suggested to him that he give ^{us} a complete and full response to his problems with the findings so that we may have something to go to the Commission with and possibly during pendency of that effort we will hold the conciliation

34040481705

Memorandum to the File
Page Two
MURs 1284, 1361 and 1389 etc.

agreement on the other three MURs to see if we could get the Commission to focus on what the bottom line would be on the Chinese waiters. The only alternative is to blow conciliation apart on all the cases and to proceed with probable cause at all angles. He will be get back as far ~~as~~ what he is going to do. If he doesn't get back the next week, I suggested that Gary or the appropriate counsel contact him with regard to his next course of action.

He also wanted to know whether Esther Kee was a respondent in the case and I told him I wasn't sure but Mike Dymersky could tell him and I told Mike to give him a call and let him know whether she was or she wasn't. He indicated he would probably not be representing her but inasmuch as she is tied in to the facts I have no problem telling Huron whether she is or is not a respondent. In fact, he indicated that he was trying to get a hold of Kee but was unable to reach her and wanted this information as a matter of convenience.

cc: Johansen
Whitehead
Sterling
Dymersky
Callahan
Thedford

34040431706



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Manuel Rodriguez, President
Comite Amigos de Jimmy Carter
403 del Parque, Suite 1001
Santurce, Puerto Rico 00912

RE: MUR 1354

Dear Mr. Rodriguez:

On December 14, 1981, Adalberto Jurado, treasurer of Comite Amigos de Jimmy Carter, received notification that the Commission had found reason to believe that the Comite Amigos de Jimmy Carter had violated 2 U.S.C. § 433 and § 441b, provisions of the Federal Election Campaign Act of 1971, as amended. (A copy of the reason to believe notification is enclosed for your reference). An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

Consequently, the Federal Election Commission has prepared the attached questions which are to be answered by you.

It is required that you submit the requested information under oath and that you do so within ten days of your receipt of this notification.

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Reason to Believe Notification
Questions

84040481707

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE March 20, 1981

MUR NO. 1354

STAFF MEMBER & TEL. NO.

RESPONDENT Comite Amigos De
Jimmy Carter

Suzanne Callahan

(202) 523-4057

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

SUMMARY OF ALLEGATIONS

On January 28, 1981, the Reports Analysis Division (RAD) referred to the Office of General Counsel, the Comite Amigos De Jimmy Carter ("The Committee") in connection with its failure to file reports of receipts and expenditures in violation of 2 U.S.C. §434a(4).

FACTUAL BASIS AND LEGAL ANALYSIS

ANALYSIS

The Committee registered as an unauthorized committee supporting the candidacy of Jimmy Carter of March 6, 1980. Subsequent to its registration, the Committee filed one report covering March 1 through April 30, 1980.

The report indicates that as of April 30th, the Committee had contracted with Joe Franco & Associates, Inc. for a total of \$218,099.74 in media services, presumably on behalf of President Carter's re-election campaign. Of that amount, \$59,000 has been paid by the Committee and the remaining \$159,099.74 is reported as an outstanding debt. Additionally, the committee reports making \$12,729.32 in independent expenditures.

The Committee was sent non-filer notices in connection with its failure to file the July 15th, October 15th, 12 day pre-general election and 30 day post general election reports on July 22nd, October 22nd, October 29, 1980 and January 23, 1981, respectively. The Committee failed to respond to any of the notices.

Additionally, the committee has failed to file the year end report in violation of §434(a)(4).

While the Committee's detailed Summary Schedule filed with the April 15, 1980 report discloses \$12,729.32 for independent expenditures, it failed to file a corresponding notarized schedule E reporting the particulars of its independent activity in violation of 2 U.S.C. §434(b)(6)(B)(iii).

34740131703

The Committee has also failed to disclose the status of its outstanding debt of \$159,099.74 owed to Joe Franco & Associates in violation of 2 U.S.C. §434(b) (8).

Therefore, the General Counsel recommends that the Commission find reason to believe that respondent has violated 2 U.S.C. §§434(a) (4), 434(b) (6) (B) (iii), and 434(b) (8)

RECOMMENDATIONS:

It is recommended that the Commission:

1. Find reason to believe the Committee violated 2 U.S.C. §434(a) (4);
2. Find reason to believe the Committee violated 2 U.S.C. §434(b) (6) (B) (iii); and
3. Find reason to believe the Committee violated 2 U.S.C. §434(b) (8).

84040481702

MAIL ROOM USE ONLY

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:
Manuel Rodriguez, Pres.
403 del Parque, #1001
Sanurce, P.R. 00912

3. ARTICLE DESCRIPTION:
REGISTERED NO. 44355 CERTIFIED NO. INSURED NO.

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE ☐ Addressee ☒ Authorized agent
DATE OF DELIVERY 24 MAY 1982

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE

1354/Callahan 5/30

☆ 6701 1070-070-002

QUESTIONS FOR MANUEL RODRIGUEZ, PRESIDENT,
COMITE AMIGOS DE JIMMY CARTER

1. State your position with the Comite Amigos de Jimmy Carter ("the Comite").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Comite's campaign activities; please list paid and volunteer workers separately.
4. Who was in charge of media activities for the Comite?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Comite.
6. What individual(s) made final decisions regarding campaign strategy?
7. Did you ever have any conversations with anyone connected in any way with the Carter-Mondale Committee, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
8. Did you ever correspond in writing with anyone connected in any way with the Carter-Mondale Committee, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
9. To your knowledge, did anyone connected with the Comite request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
10. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which any representative of the Carter-Mondale Committee was present? Please detail your response.
11. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Carter-Mondale or their plans were discussed, regardless of whether a Carter-Mondale representative was there? Please detail your response.
12. Do you recall any correspondence or conversations with Joe Franco or one of his agents in which the necessity for

84040481710

separate accounts for the Carter-Mondale committee and Comite Amigos was discussed? Please detail your response.

13. Did any officers of Comite Amigos personally meet with you and/or Joe Franco to approve media proposals? Explain.
14. Did you ever personally go to the Carter-Mondale headquarters? (Explain your response in detail and cite specific examples).
15. Do you know if anyone else associated with Comite Amigos ever personally went to the Carter-Mondale headquarters? Explain.
16. Do you know of anyone besides Joe Franco who was involved in the development of the media proposals for Comite Amigos? Please detail your response.
17. State the source of any campaign materials, including photos, strategy proposals, statistics, etc., which you considered in connection with media purchases on behalf of Jimmy Carter.
- 17a. Did you ever receive any campaign materials from anyone connected with Carter-Mondale?
18. Give specific details of what information you had access to concerning the Carter-Mondale contract with Joe Franco and Associates; from whom you received such information, where and when you received the information, and who was present, etc.
19. Please detail your knowledge of the following individuals including whether your relationship was business, social or both; in what capacity you have dealt with the named individuals including dates, times and places; whether your contact(s) with each was (were) in person, via telephone, or correspondence: (Respond to the question for each individual separately)

Mr. Terry O'Connell -

Coordinator for the
Campaign in Puerto Rico,
Washington, D.C.

Mr. Evan S. Dobelle -

National Finance Chair-
man, Carter-Mondale
Presidential Committee,
1413 K Street, N.W.,
Washington, D.C. 20005

84040481711

Mr. Bob Keefe -

National Finance
Committee, Carter-Mondale
Presidential Committee,
1413 K Street, N.W.,
Washington, D.C. 20005

Mr. Angel Viera Martinez -

Attorney of Law,
Coordinator of the
Carter-Mondale local
campaign

20. Did Joe Franco or any of his associates ever mention to you or to your knowledge to any other person connected with Comite Amigos the strategy, text, development or ideas pertaining to the Carter-Mondale media purchases? Explain your response in detail. Cite examples.
21. State your relationship with Joe Franco. How long have you known him? Is your relationship business, social or both?
22. Identify by list, in detail, all Committee records, including: any financial records, bank records, correspondence, media text and any other documents whatever in connection with Comite Amigos activities which are available for Commission inspection with the exception of the invoices from Joe Franco and Associates which have previously been submitted to the Commission by Adalberto Jurado.
23. Submit examples of texts of radio and TV spots and other campaign related materials which Comite Amigos purchased on behalf of Jimmy Carter.
24. Please provide the following documents:
- (a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings with Joe Franco and Associates including the names of those in attendance at each meeting.

34040431712



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Antonio Alfonso, Secretary
Calle Lila Num 1687
Urb. San Francisco
Rio Piedras, Puerto Rico 00927

RE: MUR 1354

Dear Mr. Alfonso:

On December 14, 1981, Adalberto Jurado, treasurer of Comité Amigos de Jimmy Carter, received notification that the Commission had found reason to believe that the Comité Amigos de Jimmy Carter had violated 2 U.S.C. § 433 and § 441b, provisions of the Federal Election Campaign Act of 1971, as amended. (A copy of the reason to believe notification is enclosed for your reference). An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

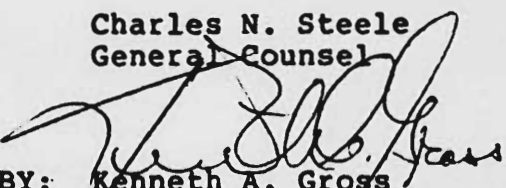
Consequently, the Federal Election Commission has prepared the attached questions which are to be answered by you.

It is required that you submit the requested information under oath and that you do so within ten days of your receipt of this notification.

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Reason to Believe Notification
Questions

34040481713

PS Form 3811, Aug. 1978

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:**
Antonio Alfonso
Calle Lila Num 1687
Rio Piedras, P.R. 00927

3. **ARTICLE DESCRIPTION:**
REGISTERED NO. CERTIFIED NO. INSURED NO.
943857

(Always obtain signature of addressee or agent)

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

4. **DATE OF DELIVERY**
JUN 10 1982

5. **ADDRESS** (Complete only if requested)

6. **UNABLE TO DELIVER BECAUSE:**

WINDOW SERVICE
35c

1354/Callahan

5/20

☆ GPO: 1978-278-562

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE March 20, 1981

MUR NO. 1354

STAFF MEMBER & TEL. NO.

RESPONDENT Comite Amigos De
Jimmy Carter

Suzanne Callahan

(202) 523-4057

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

SUMMARY OF ALLEGATIONS

On January 28, 1981, the Reports Analysis Division (RAD) referred to the Office of General Counsel, the Comite Amigos De Jimmy Carter ("The Committee") in connection with its failure to file reports of receipts and expenditures in violation of 2 U.S.C. §434a(4).

FACTUAL BASIS AND LEGAL ANALYSIS

ANALYSIS

The Committee registered as an unauthorized committee supporting the candidacy of Jimmy Carter of March 6, 1980. Subsequent to its registration, the Committee filed one report covering March 1 through April 30, 1980.

The report indicates that as of April 30th, the Committee had contracted with Joe Franco & Associates, Inc. for a total of \$218,099.74 in media services, presumably on behalf of President Carter's re-election campaign. Of that amount, \$59,000 has been paid by the Committee and the remaining \$159,099.74 is reported as an outstanding debt. Additionally, the committee reports making \$12,729.32 in independent expenditures.

The Committee was sent non-filer notices in connection with its failure to file the July 15th, October 15th, 12 day pre-general election and 30 day post general election reports on July 22nd, October 22nd, October 29, 1980 and January 23, 1981, respectively. The Committee failed to respond to any of the notices.

Additionally, the committee has failed to file the year end report in violation of §434(a)(4).

While the Committee's detailed Summary Schedule filed with the April 15, 1980 report discloses \$12,729.32 for independent expenditures, it failed to file a corresponding notarized schedule E reporting the particulars of its independent activity in violation of 2 U.S.C. §434(b)(6)(B)(iii).

34040481715

The Committee has also failed to disclose the status of its outstanding debt of \$159,099.74 owed to Joe Franco & Associates in violation of 2 U.S.C. §434(b)(8).

Therefore, the General Counsel recommends that the Commission find reason to believe that respondent has violated 2 U.S.C. §§434(a)(4), 434(b)(6)(B)(iii), and 434(b)(8)

RECOMMENDATIONS:

It is recommended that the Commission:

1. Find reason to believe the Committee violated 2 U.S.C. §434(a)(4);
2. Find reason to believe the Committee violated 2 U.S.C. §434(b)(6)(B)(iii); and
3. Find reason to believe the Committee violated 2 U.S.C. §434(b)(8).

34040481716

QUESTIONS FOR ANTONIO ALFONSO, SECRETARY
COMITE AMIGOS DE JIMMY CARTER

1. State your position with the Comité Amigos de Jimmy Carter ("the Comité").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Comité's campaign activities; please list paid and volunteer workers separately.
4. Who was in charge of media activities for the Comité?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Comité.
6. What individual(s) made final decisions regarding campaign strategy?
7. Did you ever have any conversations with anyone connected in any way with the Carter-Mondale Committee, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
8. Did you ever correspond in writing with anyone connected in any way with the Carter-Mondale Committee, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
9. To your knowledge, did anyone connected with the Comité request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
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12. Do you recall any correspondence or conversations with Joe Franco or one of his agents in which the necessity for

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Questions
Page 2

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- separate accounts for the Carter-Mondale committee and Comite Amigos was discussed? Please detail your response.
13. Did any officers of Comite Amigos personally meet with you and/or Joe Franco to approve media proposals? Explain.
14. Did you ever personally go to the Carter-Mondale headquarters? (Explain your response in detail and cite specific examples).
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Mr. Terry O'Connell -

Coordinator for the
Campaign in Puerto Rico,
Washington, D.C.

Mr. Evan S. Dobelle -

National Finance Chair-
man, Carter-Mondale
Presidential Committee,
1413 K Street, N.W.,
Washington, D.C. 20005

Mr. Bob Keefe -

National Finance
Committee, Carter-Mondale
Presidential Committee,
1413 K Street, N.W.,
Washington, D.C. 20005

Mr. Angel Viera Martinez -

Attorney of Law,
Coordinator of the
Carter-Mondale local
campaign

20. Did Joe Franco or any of his associates ever mention to you or to your knowledge to any other person connected with Comite Amigos the strategy, text, development or ideas pertaining to the Carter-Mondale media purchases? Explain your response in detail. Cite examples.
21. State your relationship with Joe Franco. How long have you known him? Is your relationship business, social or both?
22. Identify by list, in detail, all Committee records, including: any financial records, bank records, correspondence, media text and any other documents whatever in connection with Comite Amigos activities which are available for Commission inspection with the exception of the invoices from Joe Franco and Associates which have previously been submitted to the Commission by Adalberto Jurado.
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 - (b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings with Joe Franco and Associates including the names of those in attendance at each meeting.

34040431719



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

May 20, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Julio Juan Garcia, Vice President
Comite Amigos de Jimmy Carter
Ashford 1485
Santurce, Puerto Rico 00907

RE: MUR 1354

Dear Mr. Garcia:

On December 14, 1981, Adalberto Jurado, treasurer of Comite Amigos de Jimmy Carter, received notification that the Commission had found reason to believe that the Comite Amigos de Jimmy Carter had violated 2 U.S.C. § 433 and § 441b, provisions of the Federal Election Campaign Act of 1971, as amended. (A copy of the reason to believe notification is enclosed for your reference). An investigation of this matter is being conducted and it has been determined that additional information from you is necessary.

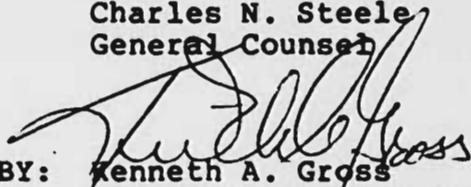
Consequently, the Federal Election Commission has prepared the attached questions which are to be answered by you.

It is required that you submit the requested information under oath and that you do so within ten days of your receipt of this notification.

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure

Reason to Believe Notification
Questions

84040481720

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE March 20, 1981

MUR NO. 1354

STAFF MEMBER & TEL. NO.

RESPONDENT Comite Amigos De
Jimmy Carter

Suzanne Callahan

(202) 523-4057

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

SUMMARY OF ALLEGATIONS

On January 28, 1981, the Reports Analysis Division (RAD) referred to the Office of General Counsel, the Comite Amigos De Jimmy Carter ("The Committee") in connection with its failure to file reports of receipts and expenditures in violation of 2 U.S.C. §434a(4).

FACTUAL BASIS AND LEGAL ANALYSIS

ANALYSIS

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The report indicates that as of April 30th, the Committee had contracted with Joe Franco & Associates, Inc. for a total of \$218,099.74 in media services, presumably on behalf of President Carter's re-election campaign. Of that amount, \$59,000 has been paid by the Committee and the remaining \$159,099.74 is reported as an outstanding debt. Additionally, the committee reports making \$12,729.32 in independent expenditures.

The Committee was sent non-filer notices in connection with its failure to file the July 15th, October 15th, 12 day pre-general election and 30 day post general election reports on July 22nd, October 22nd, October 29, 1980 and January 23, 1981, respectively. The Committee failed to respond to any of the notices.

Additionally, the committee has failed to file the year end report in violation of §434(a)(4).

While the Committee's detailed Summary Schedule filed with the April 15, 1980 report discloses \$12,729.32 for independent expenditures, it failed to file a corresponding notarized schedule E reporting the particulars of its independent activity in violation of 2 U.S.C. §434(b)(6)(B)(iii).

34040481721

The Committee has also failed to disclose the status of its outstanding debt of \$159,099.74 owed to Joe Franco & Associates in violation of 2 U.S.C. §434(b)(8).

Therefore, the General Counsel recommends that the Commission find reason to believe that respondent has violated 2 U.S.C. §§434(a)(4), 434(b)(6)(B)(iii), and 434(b)(8)

RECOMMENDATIONS:

It is recommended that the Commission:

1. Find reason to believe the Committee violated 2 U.S.C. §434(a)(4);
2. Find reason to believe the Committee violated 2 U.S.C. §434(b)(6)(B)(iii); and
3. Find reason to believe the Committee violated 2 U.S.C. §434(b)(8).

34040431722

MAIL ROOM 1100 WASH DC

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 Juan Garcia
Ashford 1485
Sancti Spiritus, P.R. 00907

3. ARTICLE DESCRIPTION:

REGISTERED NO. CERTIFIED NO. INSURED NO.

143654 721212

4. I have received the article described above.

SIGNATURE ☐ Addressee ☐ Authorized agent

5. DATE OF DELIVERY

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7. UNABLE TO DELIVER BECAUSE

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1000-1000-1000

QUESTIONS FOR JULIO JUAN GARCIA, VICE PRESIDENT
COMITE AMIGOS DE JIMMY CARTER

1. State your position with the Comit  Amigos de Jimmy Carter ("the Comit ").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Comit 's campaign activities; please list paid and volunteer workers separately.
4. Who was in charge of media activities for the Comit ?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Comit .
6. What individual(s) made final decisions regarding campaign strategy?
7. Did you ever have any conversations with anyone connected in any way with the Carter-Mondale Committee, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
8. Did you ever correspond in writing with anyone connected in any way with the Carter-Mondale Committee, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
9. To your knowledge, did anyone connected with the Comit  request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
10. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which any representative of the Carter-Mondale Committee was present? Please detail your response.
11. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Carter-Mondale or their plans were discussed, regardless of whether a Carter-Mondale representative was there? Please detail your response.
12. Do you recall any correspondence or conversations with Joe Franco or one of his agents in which the necessity for

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separate accounts for the Carter-Mondale committee and Comite Amigos was discussed? Please detail your response.

13. Did any officers of Comite Amigos personally meet with you and/or Joe Franco to approve media proposals? Explain.
14. Did you ever personally go to the Carter-Mondale headquarters? (Explain your response in detail and cite specific examples).
15. Do you know if anyone else associated with Comite Amigos ever personally went to the Carter-Mondale headquarters? Explain.
16. Do you know of anyone besides Joe Franco who was involved in the development of the media proposals for Comite Amigos? Please detail your response.
17. State the source of any campaign materials, including photos, strategy proposals, statistics, etc., which you considered in connection with media purchases on behalf of Jimmy Carter.
- 17a. Did you ever receive any campaign materials from anyone connected with Carter-Mondale?
18. Give specific details of what information you had access to concerning the Carter-Mondale contract with Joe Franco and Associates; from whom you received such information, where and when you received the information, and who was present, etc.
19. Please detail your knowledge of the following individuals including whether your relationship was business, social or both; in what capacity you have dealt with the named individuals including dates, times and places; whether your contact(s) with each was (were) in person, via telephone, or correspondence: (Respond to the question for each individual separately)

Mr. Terry O'Connell -

Coordinator for the
Campaign in Puerto Rico,
Washington, D.C.

- Mr. Evan S. Dobelle -

National Finance Chair-
man, Carter-Mondale
Presidential Committee,
1413 K Street, N.W.,
Washington, D.C. 20005

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Mr. Bob Keefe -

National Finance
Committee, Carter-Mondale
Presidential Committee,
1413 K Street, N.W.,
Washington, D.C. 20005

Mr. Angel Viera Martinez -

Attorney of Law,
Coordinator of the
Carter-Mondale local
campaign

20. Did Joe Franco or any of his associates ever mention to you or to your knowledge to any other person connected with Comite Amigos the strategy, text, development or ideas pertaining to the Carter-Mondale media purchases? Explain your response in detail. Cite examples.
21. State your relationship with Joe Franco. How long have you known him? Is your relationship business, social or both?
22. Identify by list, in detail, all Committee records, including: any financial records, bank records, correspondence, media text and any other documents whatever in connection with Comite Amigos activities which are available for Commission inspection with the exception of the invoices from Joe Franco and Associates which have previously been submitted to the Commission by Adalberto Jurado.
23. Submit examples of texts of radio and TV spots and other campaign related materials which Comite Amigos purchased on behalf of Jimmy Carter.
24. Please provide the following documents:
- (a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (b) Contemporaneous memoranda, including telephone logs, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings with Joe Franco and Associates including the names of those in attendance at each meeting.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Douglas B. Huron, Esquire
1619 New Hampshire Avenue, N.W.
Washington, D.C. 20009

RE: MUR 1354

Dear Mr. Huron:

On December 14, 1981, you received notification that the Commission has found reason to believe that your client, the Carter-Mondale Presidential Committee, had violated 2 U.S.C. § 433, § 434, § 441a(b) and § 441b, provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

Consequently, the Federal Election Commission has prepared the attached questions which are to be answered by Terry O'Connell, Evan S. Dobelle, Bob Keefe and Angel Viera Martinez.

Please advise the named individuals to submit the information under oath and to do so within fifteen days of your receipt of this notice.

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

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QUESTIONS FOR TERRY O'CONNELL

1. State your position with the Carter-Mondale Presidential Committee ("the Committee").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Committee's campaign activities in Puerto Rico, separated as to paid and volunteer workers.
4. Who was in charge of media activities for the Committee in Puerto Rico?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Committee.
6. What individual(s) made final decisions regarding campaign strategy in Puerto Rico?
7. When did you have knowledge of the existence of the Comite Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign?
8. To your knowledge, when did other Committee agents become aware of the existence of the Comite Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign? Please detail your response.
9. Did you ever have any conversations with anyone connected in any way with the Comite Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
10. Did you ever correspond in writing with anyone connected in any way with the Comite Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
11. To your knowledge, did anyone connected with the Comite request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
12. Did you supply pictures, statistics, texts or any other materials whatever to either (a) Comite Amigos directly or (b) to Joe Franco and Associates for use in media production for Comite Amigos? Please detail your response.

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13. To your knowledge, did any committee agents supply pictures, statistics, texts or any other materials whatever to either (a) Comit  Amigos directly or (b) to Joe Franco and Associates for use in media production for Comit  Amigos: Please detail your response.
14. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which Adalberto Jurado and/or Manuel Rodriguez or any other agent of Comit  Amigos was present? Please detail your response.
15. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Comit  Amigos or their plans were discussed, regardless of whether an Amigos representative was there? Please detail your response.
16. Did you ever correspond with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comit  Amigos was discussed? Please detail your response.
17. Did you ever have any conversations with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comit  Amigos was discussed? Please detail your response.
18. Please provide the following documents:
- (a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter by the Comit  Amigos de Jimmy Carter.
 - (b) Contemporaneous memoranda, including telephone logs, daily calendars, desk diaries, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comit  Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings, including notes taken by anyone in attendance at said meetings, with Joe Franco and Associates including the names of those in attendance at each meeting.

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QUESTIONS FOR BOB KEEFE

1. State your position with the Carter-Mondale Presidential Committee ("the Committee").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Committee's campaign activities in Puerto Rico, separated as to paid and volunteer workers.
4. Who was in charge of media activities for the Committee in Puerto Rico?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Committee.
6. What individual(s) made final decisions regarding campaign strategy in Puerto Rico?
7. When did you have knowledge of the existence of the Comité Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign?
8. To your knowledge, when did other Committee agents become aware of the existence of the Comité Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign? Please detail your response.
9. Did you ever have any conversations with anyone connected in any way with the Comité Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
10. Did you ever correspond in writing with anyone connected in any way with the Comité Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
11. To your knowledge, did anyone connected with the Comité request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
12. Did you supply pictures, statistics, texts or any other materials whatever to either (a) Comité Amigos directly or (b) to Joe Franco and Associates for use in media production for Comité Amigos? Please detail your response.

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13. To your knowledge, did any committee agents supply pictures, statistics, texts or any other materials whatever to either (a) Comit  Amigos directly or (b) to Joe Franco and Associates for use in media production for Comit  Amigos: Please detail your response.
14. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which Adalberto Jurado and/or Manuel Rodriguez or any other agent of Comit  Amigos was present? Please detail your response.
15. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Comit  Amigos or their plans were discussed, regardless of whether an Amigos representative was there? Please detail your response.
16. Did you ever correspond with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comit  Amigos was discussed? Please detail your response.
17. Did you ever have any conversations with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comit  Amigos was discussed? Please detail your response.
18. Please provide the following documents:
- (a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter by the Comit  Amigos de Jimmy Carter.
 - (b) Contemporaneous memoranda, including telephone logs, daily calendars, desk diaries, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comit  Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings, including notes taken by anyone in attendance at said meetings, with Joe Franco and Associates including the names of those in attendance at each meeting.

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QUESTIONS FOR ANGEL VIERA MARTINEZ

1. State your position with the Carter-Mondale Presidential Committee ("the Committee").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Committee's campaign activities in Puerto Rico, separated as to paid and volunteer workers.
4. Who was in charge of media activities for the Committee in Puerto Rico?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Committee.
6. What individual(s) made final decisions regarding campaign strategy in Puerto Rico?
7. When did you have knowledge of the existence of the Comité Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign?
8. To your knowledge, when did other Committee agents become aware of the existence of the Comité Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign? Please detail your response.
9. Did you ever have any conversations with anyone connected in any way with the Comité Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
10. Did you ever correspond in writing with anyone connected in any way with the Comité Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
11. To your knowledge, did anyone connected with the Comité request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
12. Did you supply pictures, statistics, texts or any other materials whatever to either (a) Comité Amigos directly or (b) to Joe Franco and Associates for use in media production for Comité Amigos? Please detail your response.

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Questions

Page 2

13. To your knowledge, did any committee agents supply pictures, statistics, texts or any other materials whatever to either (a) Comite Amigos directly or (b) to Joe Franco and Associates for use in media production for Comite Amigos: Please detail your response.
14. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which Adalberto Jurado and/or Manuel Rodriguez or any other agent of Comite Amigos was present? Please detail your response.
15. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Comite Amigos or their plans were discussed, regardless of whether an Amigos representative was there? Please detail your response.
16. Did you ever correspond with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comite Amigos was discussed? Please detail your response.
17. Did you ever have any conversations with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comite Amigos was discussed? Please detail your response.
18. Please provide the following documents:
- (a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (b) Contemporaneous memoranda, including telephone logs, daily calendars, desk diaries, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings, including notes taken by anyone in attendance at said meetings, with Joe Franco and Associates including the names of those in attendance at each meeting.

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QUESTIONS FOR EVAN S. DOBELLE

1. State your position with the Carter-Mondale Presidential Committee ("the Committee").
2. What were your duties in that capacity?
3. Please state the names of all individuals who worked for or were involved in any capacity whatever with the Committee's campaign activities in Puerto Rico, separated as to paid and volunteer workers.
4. Who was in charge of media activities for the Committee in Puerto Rico?
5. List all individuals authorized at any time to negotiate media expenditures on behalf of the Committee.
6. What individual(s) made final decisions regarding campaign strategy in Puerto Rico?
7. When did you have knowledge of the existence of the Comité Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign?
8. To your knowledge, when did other Committee agents become aware of the existence of the Comité Amigos de Jimmy Carter and its proposed or actual activities on behalf of the Carter campaign? Please detail your response.
9. Did you ever have any conversations with anyone connected in any way with the Comité Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of those individuals, any other individuals who were present as well as the dates of the conversations and the subject matter discussed.
10. Did you ever correspond in writing with anyone connected in any way with the Comité Amigos de Jimmy Carter, either as an officer, member or agent of the Committee? If so, please state the names of the individuals, the dates of the correspondence and the subject matter of the correspondence; please forward copies of such correspondence if available.
11. To your knowledge, did anyone connected with the Comité request authorization from the Carter-Mondale Committee [to place advertisements in the media?]
12. Did you supply pictures, statistics, texts or any other materials whatever to either (a) Comité Amigos directly or (b) to Joe Franco and Associates for use in media production for Comité Amigos? Please detail your response.

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Questions

Page 2

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13. To your knowledge, did any committee agents supply pictures, statistics, texts or any other materials whatever to either (a) Comite Amigos directly or (b) to Joe Franco and Associates for use in media production for Comite Amigos: Please detail your response.
 14. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which Adalberto Jurado and/or Manuel Rodriguez or any other agent of Comite Amigos was present? Please detail your response.
 15. Were you ever present at any meeting(s) whatever with Joe Franco and Associates in which the activities of Comite Amigos or their plans were discussed, regardless of whether an Amigos representative was there? Please detail your response.
 16. Did you ever correspond with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comite Amigos was discussed? Please detail your response.
 17. Did you ever have any conversations with Joe Franco or one of his agents in which the necessity for separate accounts for the principal committee and Comite Amigos was discussed? Please detail your response.
 18. Please provide the following documents:
 - (a) All correspondence, memoranda, or other relevant documents from or to you under your control which pertain to campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (b) Contemporaneous memoranda, including telephone logs, daily calendars, desk diaries, and any other records under your control regarding phone calls or other oral communication with persons associated with campaign related activities on behalf of Jimmy Carter by the Comite Amigos de Jimmy Carter.
 - (c) Minutes or any other documentation of meetings, including notes taken by anyone in attendance at said meetings, with Joe Franco and Associates including the names of those in attendance at each meeting.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

May 20, 1982

Luis Rodriguez Bigas, Esquire
Melendez Perez and Rodriguez Bigas
GPO Box 5072
San Juan, Puerto Rico 00936-5072

RE: MUR 1354

Dear Mr. Rodriguez Bigas:

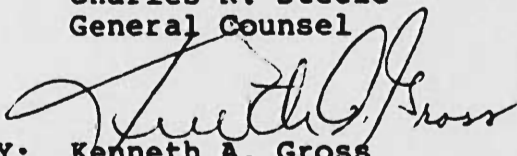
The Commission is in receipt of the answers to our interrogatories from your client, Joe Franco, dated May 5, 1982. The responses filed by Mr. Franco have raised several additional issues which must now be addressed.

Please have Mr. Franco respond to the enclosed questions within ten days of your receipt of this notification. If for any reason you are unable to meet this deadline, please advise the Commission in order that a mutually agreeable timetable can be established.

Thank you for your cooperation in this matter. Should you have any questions, contact Suzanne Callahan at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Questions

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QUESTIONS FOR JOE FRANCO

1. In your response of May 5, 1982, to question 1(a), you state in part,

"Bob Keefe - Contacted us personally"

Does this mean Bob Keefe initiated contact with you? How?

2. Did you or any other representative of Joe Franco and Associates ever personally meet with Mr. Keefe in Puerto Rico? Anywhere else?
3. Were any notes, tape recordings or minutes of any kind taken during any meetings whatsoever held between representatives of Joe Franco and Associates and either (a) representatives of the Carter-Mondale Presidential Committee and/or (b) representatives of Comite Amigos de Jimmy Carter?
4. Were any duplicate films, TV spots, brochures, written advertisements or any other media productions for the Carter campaign used by both Comite Amigos and the Carter-Mondale Committee. Please be specific in your response.
5. In your response of May 5, 1982, to question 2, you state in part,

As we informed before, the accounts for the Carter-Mondale Committee and Comite Amigos de Jimmy Carter were to be kept separate in our billings but the advertising strategy, media placing, decisions as to advertising productions, were ordered and/or taken by the same people. (Emphasis added)

By whom were you told of the arrangement to keep the billings separate? What reason was given? Please give specific details.

6. What individual(s) advised you as to whether the billing for a particular purchase should be billed to the account of Comite Amigos or Carter-Mondale? Please be specific.
7. From whom did you receive materials used in design and preparation of media productions for Comite Amigos? i.e., statistics, quotes, photos, etc.

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20461

MEMORANDUM TO: CHARLES N. STEELE
FROM: MARJORIE W. EMMONS/JODY C. RANSOM *JCR*
DATE: MAY 20, 1982
SUBJECT: MUR 1354 - First Comprehensive Investigative
Report signed May 18, 1982; Received in
OCS, 5-18-82, 2:29

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 11:00,
May 19, 1982.

There were no objections to the report at the
time of the deadline.

84040481737

May 18, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1354

Please have the attached Comprehensive Investigative
Report distributed to the Commission on a 24 hour no
objection basis. Thank you.

Attachment

cc: Callahan

34040481738

SENSITIVE

BEFORE THE FEDERAL ELECTION COMMISSION

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

In the Matter of)
Carter-Mondale)
Presidential Committee)
Comite Amigos de Jimmy)
Carter)
Joe Franco and)
Associates)

MUR 1354

82 MAY 18 P 2: 29

FIRST COMPREHENSIVE INVESTIGATIVE REPORT

At issue in this matter is whether expenditures made on behalf of the Carter-Mondale Committee by the Comite Amigos de Jimmy Carter were independent within the meaning of the Act.

The Commission has previously found reason to believe that:

- (a) The Comite Amigos violated 2 U.S.C. § 433, § 434 and § 441b;
- (b) The Carter-Mondale Committee violated 2 U.S.C. § 433, § 434, § 441a(b) and § 441b; and
- (c) Joe Franco and Associates violated 2 U.S.C. § 441b.

Both Joe Franco and Comite Amigos have twice been issued orders to answer questions in connection with this MUR.

Adalberto Jurado, treasurer of Comite Amigos, responded to our questions by stating that he dealt only with the financial aspects of Comite Amigos and could not provide information as to the development and production of political advertisements. Jurado stated that the Comite "relied almost totally on Joe Franco and Associates' judgment for the development of the campaign."

The answers submitted by Joe Franco directly refute the Carter Committee's contention that no substantive contact occurred between the principal committee and Comite Amigos on the subject of media purchases. Joe Franco maintains that

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representatives of the Carter Committee were present at all meetings in which Comite Amigos advertisements were discussed.

Joe Franco has stated under oath:

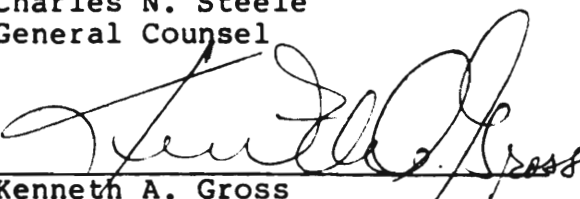
As we informed before, the accounts for the Carter-Mondale Committee and Comite Amigos were to be kept separate in our billings but the advertising strategy, media placing, decisions as to advertising productions, were ordered and/or taken by the same people. Example: Mr. Dobelle and Mr. Viera Martinez 1/ were present at all meetings and were the ones who decided what was to be done.

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The Office of General Counsel is currently preparing interrogatories to be sent to the Carter-Mondale officials named by Joe Franco as media consultants/advisers to Comite Amigos. Upon receipt of the information we seek from the Carter-Mondale Committee, a recommendation concerning the necessity for further investigation, including depositions, will be made to the Commission.

Charles N. Steele
General Counsel

May 18, 1982
Date

BY:


Kenneth A. Gross
Associate General Counsel

1/ Evan Dobelle:

National Finance Chairman, Carter-Mondale Presidential Committee.

Viera Martinez:

Attorney, Coordinator of Carter-Mondale local campaign in Puerto Rico.

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RECEIVED

6cc# 7745

82 MAY 14 P 1: 51

82 MAY 14 P 2: 59

MELLENDEZ PEREZ & RODRIGUEZ BIGAS

G.P.O. BOX 5072

SAN JUAN, PUERTO RICO 00936-5072

TO Ms. Suzanne Callahan
Federal Election Commission
Washington, D. C. 20463

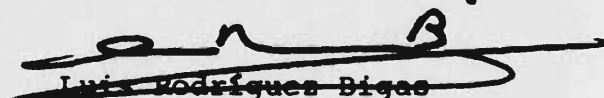
DATE May 12, 1982

SUBJECT MUR 1354

Dear Ms. Callahan:

Enclosed please find notarized answers prepared by Joe Franco
to the questions sent by the Federal Election Commission on April 5, 1982.

Very truly yours,


~~Luis Rodriguez Bigas~~

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Advertising

**JOE FRANCO
& ASSOCIATES, Inc.**

Public Relations

82 MAY 14 5 1:5

May 5, 1982

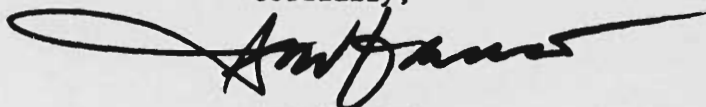
Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1354

Dear Mr. Steele:

As per your letter of April 5, 1982 we are enclosing
the information requested.

Cordially,



Joe Franco
President

JF/lmm

84040481742

1.

a) Terry O'Connell - Contact with him was mostly personal.

Evan S. Dobelle - Contact with him was mostly personal and thru phone.

Bob Keefe - Contacted us personally.

Angel Viera Martínez - Contact was done personally and via telephone.

Adalberto Jurado - Contact was done personally and via phone.

b) Between February 19, 1980 thru March 15, 1980, almost everyday thru this period these people met with us to discuss media strategy, advertising campaign, media placing, productions, spots. All these were discussed on a day-today basis.

c) The purpose of each meeting was to discuss almost daily the advertising strategy & analysis, the texts for radio, press & TV spots and their placing.

d) Most of the time people present were:

Evan S. Dobelle
Terry O'Connell
Angel Viera Martínez
Attorney Virgilio Ramos
(representing the Governor of Puerto Rico).

Mr. Manuel Rodríguez was only a figure head. He had nothing to do with the decisions.

2. Referring to Item 10 the Comité Amigos de Jimmy Carter was a group formed in Puerto Rico to raise and make available funds for the Democratic Primaries in the Island. As we informed before, the accounts for the Carter-Mondale, Committee and Comité Amigos de Jimmy Carter were to be kept separate in our billings but the advertising strategy, media placing, decisions as to advertising productions, were ordered and/or taken by the same people.

Example: Mr. Dobelle and Mr. Viera Martínez were present at all meetings and

were the ones who decided what was to be done.

3. Referring to Item 6; (b):

Carter Mondale-Committee:

Mr. Evan S. Dobelle, National Finance Chairman

Carter-Mondale Presidential Committee
1413 K Street N.W.
Washington, D.C. 20005

Mr. Angel Viera Martínez
Coordinator of the Carter-Mondale Local Campaign
House of Representatives
San Juan, Puerto Rico 00902

These two persons supplied us with photos and approved all advertising for the campaign.

Comité Amigos de Jimmy Carter - the same two persons mentioned above supplied photos and approved all advertising.

4. Yes. As the people involved in both committees were the same, they were all involved in approving all media purchases and all advertising for Comité Amigos de Jimmy Carter. The best example is the presence of Mr. Evan S. Dobelle, at the Comité de Amigos de Jimmy Carter meetings with our advertising agency.

5. We have never used a collection agency in our attempt to collect from these two accounts. We used our lawyer to collect from Carter Mondale Committee because:

- a) they were not located in Puerto Rico.
- b) no answers were received to all our letters and phone calls.

As to the Comité de Amigos de Jimmy Carter collection efforts are still being made with the local people.

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6. Personal contacts have been made with them trying to collect the amount owed us.

7. We helped the Comité Amigos de J. Carter in organizing a fund-raising activity held on May 16/18 called "Victoria 80" (1980 Victory) held at the Condado Holiday Inn Hotel:

We ordered the printing of the tickets & they were sold by members of Comité Amigos. The activity was a banquet. We advanced the down payment for the hotel - this was reimbursed to us by the Committee immediately after the banquet. This activity was organized by the local Committee people who agreed to charge \$100.00 per ticket. Mr. Viera Martínez and Mr. Jurado were involved in the money raising activity. Our participation was limited to the contracting of the music, hotel and audio amplifiers. The selling of tickets and receipt of payments were not under our responsibility. That belonged exclusively to Comité Amigos de Jimmy Carter.

8. A 21" press ad was published on May 13 announcing the activity. We do not have a list of persons contacted to purchase tickets.

9. No fund-raisers were held for Carter-Mondale that we know of or with our participation. As to why we do not know. They probably had funds available but this is a question to be answered by them.

10. Usually political clients organize fundraising activities and request us to print invitations or publish ads announcing the activity. Since that is part of the services we offer we do so and then bill for our services.

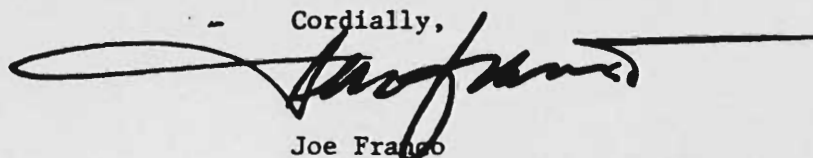
11. Mr. Adalberto Jurado was known superficially but it was not until the Carter Campaign that we knew him well for he was appointed Treasurer of Comité Amigos de Jimmy Carter. He was the person in charge of paying the bills

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presented to Comité Amigos de J. Carter.

12. We do not have copy of texts but we do have a 3/4 inches Videotapes with TV spots which we can provide you if you feel it might help.
13. Normally political advertising is paid in advance or clients make payments while campaign is running. Usually if there are any debts they are payed within a 30-90 days when we deal with persons known to us for many years and when we have had business relationships we are more lenient in our request of payments. We feel business relationships are valuable and in collecting debts we take this into consideration.

Cordially,



Joe Franco

off. No. 7,253

Sworn & suscribed before me by Joe Franco, of legal age, married, President of Joe Franco & Associates and resident of San Juan, Puerto Rico, to me personally known in San Juan, Puerto Rico on May 12, 1982.




Luis Rodríguez Bigas
Notary Public

34040481746

P. O. BOX 1106
SAN JUAN, PUERTO RICO 00902

Raúl Torres Viera
ABOGADO — NOTARIO
ATTORNEY AT LAW

RECEIVED
201549
82 MAY 20 A 9:33
6004 7790

May 9, 1982

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

Dear Mr. Steele:

Please be notified that, as of this date, the suscribing attorney no longer represents Mr. Adalberto Jurado in MUR 1354.

I take this opportunity to request from the Commission to grant Mr. Jurado not less than 30 days to find and inform the Commission his new counsel.

Any communications in this matter should be forwarded to Mr. Jurado's record address directly.

Sincerely yours,


Raúl Torres Viera

cc. Mr. Adalberto Jurado

/omht

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20513

RECEIVED
Ga# 7760

82 MAY 17 AIO: 42

May 9, 1982

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

RE: MUR 1354

Dear Mr. Steele:

The following are my answers to your questions dated April 25, 1982.

1. Manuel Rodríguez was President of "Comité Amigos de Jimmy Carter. That fact was previously disclosed in my letter dated October 20th and May 15th, 1981.

2. Mr. Rodríguez met regularly with me regarding the approval of the work done by Joe Franco & Associates. Nevertheless, we mainly relied on Joe Franco & Associates judgment due to their expertise in such field, and usually approved what they prepared or did.

3. To the best of my recollection, I never went to Carter-Mondale Committee headquarters.

4. I don't know if Mr. Rodríguez did.

5. To the best of my knowledge, there was nobody else.

6. As I stated in my answer to item number 2, "Comité Amigos de Jimmy Carter" relied almost totally on Joe Franco & Associates' judgment for the development of the campaign.

I presume that Associates prepared the campaign using their own sources. I didn't furnish materials to him. I don't know if someone else in "Comité Amigos de Jimmy Carter" did.

7. To the best of my recollection, I met with Mr. Joe Franco in order to verbally contract his company services to prepare and develop a political advertising campaign on behalf of candidate Jimmy Carter to be ran for the March 1, 1980 Presidential Primary. We discussed the duration of the campaign that was to be until the March 16, 1980 primary date, and the billing method which was to be on credit basis as was usually done by Associates. On that only occasion a group of gentlemen from the Carter-Mondale Committee were present to discuss with Mr. Franco the services to be rendered to them by Associates for their campaign. I presume that Mr. Franco met with the two Committees at the same time to discuss with them, Associates' basic contract terms that were common to him like duration, billing methods, etc. After that date I never met with Mr. Franco in the presence of any representative of the Carte-Mondale Committee and never discussed anything related to the campaign with anyone representing the Carter-Mondale Committee.

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8. I don't have or had business, social or any other relation with neither Terry O'Connell, Evan S. Dobelle, nor Bob Keefe. I only met them personally on Joe Franco & Associates' offices at the meeting related on item number 7.

Mr. Angel Viera Martínez is a personal friend. I've known him for many years and my relations with him are social. No business or any other relationship was held or developed in regard to the presidential primary campaign.

9. No.

10. I consider Mr. Franco a friend. I've known him for many years and we have social relations. This presidential primary was the first time I've had business relations with him. Puerto Rico is a small island and people, even though they may not know each other extremely well, usually have some kind of relations with each other. Normally, they are social relations, since people usually coincide at the same social activities or live at the same or nearby neighborhoods, or have common friends, etc.

11. He never discussed that matter with me.

12. When this matter came under review by the Federal Election Commission, I made some inquiries and found that judicial proceedings were filed against Carter-Mondale Committee.

13. It was Joe Franco & Associates' idea. He asked for my cooperation in helping him buying and selling tickets to the general public. That I did.

14. I don't have knowledge of any other.

15. I don't know. I do know that neither the "Comité Amigos de Jimmy Carter" nor myself are involved in any activities or plans for such purpose.

16. General public means anyone regardless of race, religious creed, sex or political affiliation who wished to buy a ticket for a certain price that included drinks, dinner, stage show, dance, music and a speech on local issues by a local political personality.

17. I don't know. Since Joe Franco & Associates were in charge of the activity they are the ones that may answer this question adequately. I only received some tickets to buy for myself and sell them on a person to person basis.

18. All records in my possession have been furnished to the Commission. Nevertheless, I'm trying to locate additional documents as soon as I find them I will send them to the Commission. Sample of campaign materials and documents can only be furnished thru Associates since they made them and I have no materials nor samples in stock.

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Mr. Charles N. Steele
May 9, 1982
Page 3

19. I refer to item 18.

I hope this answers will be of help in your inquiry. I will be glad within my personal limitations to keep cooperating with the Commission.


Alberto Jurado
Former Treasurer
Comité Amigos de Jimmy Carter

Affidavit No. 939

Sworn and subscribed before me by Adalberto Jurado, of legal age, married, businessman and resident of Puerto Rico, whom I personally know as of this date in San Juan, Puerto Rico.



/omht


Notary Public

84040481750

8 4 0 4 0 4 8 1 7 5 1

82 MAY 10 P3:42
68# 7717

MELLENDEZ PEREZ & RODRIGUEZ BIGAS

G.P.O. BOX 5072

SAN JUAN, PUERTO RICO 00936-5072

TO Ms. Suzanne Callahan
Federal Election Commission
Washington, D. C. 20463

DATE May 7, 1982

SUBJECT MUR 1354

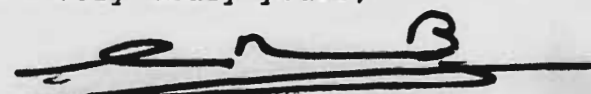
82 MAY 10 P5:29

CONFIDENTIAL

Dear Ms. Callahan:

Enclosed please find answers prepared by Joe Franco to the
questions sent by the Federal Election Commission on April 5, 1982.

Very truly yours,


Luis Rodríguez Bigas

Advertising

**JOE FRANCO
& ASSOCIATES, Inc.**

Public Relations

May 5, 1982

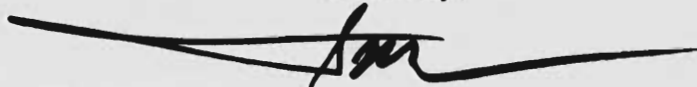
Mr. Charles N. Steele
General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 1354

Dear Mr. Steele:

As per your letter of April 5, 1982 we are enclosing
the information requested.

Cordially,



Joe Franco
President

JF/lmm

84040481752

1.

- a) Terry O'Connell - Contact with him was mostly personal.
Evan S. Dobelle - Contact with him was mostly personal and thru phone.
Bob Keefe - Contacted us personally.
Angel Viera Martínez - Contact was done personally and via telephone.
Adalberto Jurado - Contact was done personally and via phone.
- b) Between February 19, 1980 thru March 15, 1980, almost everyday thru this period these people met with us to discuss media strategy, advertising campaign, media placing, productions, spots. All these were discussed on a day-today basis.
- c) The purpose of each meeting was to discuss almost daily the advertising strategy & analysis, the texts for radio, press & TV spots and their placing.
- d) Most of the time people present were:

Evan S. Dobelle
Terry O'Connell
Angel Viera Martínez
Attorney Virgilio Ramos
(representing the Governor of Puerto Rico).

Mr. Manuel Rodríguez was only a figure head. He had nothing to do with the decisions.

2. Referring to Item 10 the Comité Amigos de Jimmy Carter was a group formed in Puerto Rico to raise and make available funds for the Democratic Primaries in the Island. As we informed before, the accounts for the Carter-Mondale, Committee and Comité Amigos de Jimmy Carter were to be kept separate in our billings but the advertising strategy, media placing, decisions as to advertising productions, were ordered and/or taken by the same people.

Example: Mr. Dobelle and Mr. Viera Martínez were present at all meetings and

were the ones who decided what was to be done.

3. Referring to Item 6; (b):

Carter Mondale-Committee:

Mr. Evan S. Dobelle, National Finance Chairman

Carter-Mondale Presidential Committee
1413 K Street N.W.
Washington, D.C. 20005

Mr. Angel Viera Martínez
Coordinator of the Carter-Mondale Local Campaign
House of Representatives
San Juan, Puerto Rico 00902

These two persons supplied us with photos and approved all advertising for the campaign.

Comité Amigos de Jimmy Carter - the same two persons mentioned above supplied photos and approved all advertising.

4. Yes. As the people involved in both committees were the same, they were all involved in approving all media purchases and all advertising for Comité Amigos de Jimmy Carter. The best example is the presence of Mr. Evan S. Dobelle, at the Comité de Amigos de Jimmy Carter meetings with our advertising agency.

5. We have never used a collection agency in our attempt to collect from these two accounts. We used our lawyer to collect from Carter Mondale Committee because:

- a) they were not located in Puerto Rico.
- b) no answers were received to all our letters and phone calls.

As to the Comité de Amigos de Jimmy Carter collection efforts are still being made with the local people.

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6. Personal contacts have been made with them trying to collect the amount owed us.

7. We helped the Comité Amigos de J. Carter in organizing a fund-raising activity held on May 16/18 called "Victoria 80" (1980 Victory) held at the Condado Holiday Inn Hotel:

We ordered the printing of the tickets & they were sold by members of Comité Amigos. The activity was a banquet. We advanced the down payment for the hotel - this was reimbursed to us by the Committee immediately after the banquet. This activity was organized by the local Committee people who agreed to charge \$100.00 per ticket. Mr. Viera Martínez and Mr. Jurado were involved in the money raising activity. Our participation was limited to the contracting of the music, hotel and audio amplifiers. The selling of tickets and receipt of payments were not under our responsibility. That belonged exclusively to Comité Amigos de Jimmy Carter.

8. A 21" press ad was published on May 13 announcing the activity. We do not have a list of persons contacted to purchase tickets.

9. No fund-raisers were held for Carter-Mondale that we know of or with our participation. As to why we do not know. They probably had funds available but this is a question to be answered by them.

10. Usually political clients organize fundraising activities and request us to print invitations or publish ads announcing the activity. Since that is part of the services we offer we do so and then bill for our services.

11. Mr. Adalberto Jurado was known superficially but it was not until the Carter Campaign that we knew him well for he was appointed Treasurer of Comité Amigos de Jimmy Carter. He was the person in charge of paying the bills

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presented to Comité Amigos de J. Carter.

12. We do not have copy of texts but we do have a 3/4 inches Videotapes with TV spots which we can provide you if you feel it might help.
13. Normally political advertising is paid in advance or clients make payments while campaign is running. Usually if there are any debts they are payed within a 30-90 days when we deal with persons known to us for many years and when we have had business relationships we are more lenient in our request of payments. We feel business relationships are valuable and in collecting debts we take this into consideration.

34040481756



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

April 5, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Luis Rodriguez-Bigas, Esquire
GPO Box 5072
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Rodriguez-Bigas:

On December 14, 1981, you received notification that the Commission had found reason to believe that Joe Franco and Associates violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your client to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that your client submit the information under oath and that he does so within fifteen days of your receipt of this subpoena and order.

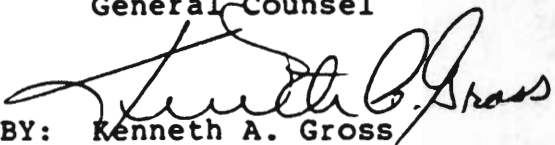
84040481757

Letter to Luis Rodriguez-Bigas
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057. In her absence, contact Thomas Whitehead at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions


1354 - Callahan

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:
Luis Rodriguez-Bigas, Esq.
GPO Box 5072
San Juan, PR 00936

3. ARTICLE DESCRIPTION:
REGISTERED NO. CERTIFIED NO. RETURNED NO.
559216

(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE  DATE OF DELIVERY 4/12/72

4. ADDRESS (Complete only if)

5. UNABLE TO DELIVER REASON

APR 12 1972
USPO

84040431753



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Luis Rodriguez-Bigas, Esquire
GPO Box 5072
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Rodriguez-Bigas:

On December 14, 1981, you received notification that the Commission had found reason to believe that Joe Franco and Associates violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your client to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that your client submit the information under oath and that he does so within fifteen days of your receipt of this subpoena and order.

34040481759

Letter to Luis Rodriguez-Bigas
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057. In her absence, contact Thomas Whitehead at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions

84040481760

Handwritten initials and date:
JL
4/10

BEFORE THE FEDERAL ELECTION COMMISSION

Joe Franco)

MUR 1354

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within fifteen days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on *apr. 2*, 1982.

Frank P. Reiche

Frank P. Reiche
Chairman of the Federal
Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions

34040481731

ATTACHMENT TO ORDER TO ANSWER QUESTIONS

QUESTIONS TO JOE FRANCO

In your response to each of the following questions, please differentiate between the Carter-Mondale Committee and Comite Amigos by stating the committee's full name whenever applicable.

1. On June 26, 1981, you were issued an Order by the Commission which propounded 14 questions. Question number 2 was as follows:

"2. State the name and address of each person who was involved in any way in negotiating the contract between Associates and the Committee."

Your response to the above question was as follows:

- "2. The persons involved in the negotiation to contract our services for the Carter-Mondale Presidential Committee were:

Mr. Terry O'Connell -	Coordinator for the Campaign in Puerto Rico, Washington, D.C.
Mr. Evan S. Dobelle -	National Finance Chairman, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005
Mr. Bob Keefe -	National Finance Committee, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005
Mr. Angel Viera Martinez -	Attorney of Law, Coordinator of the Carter- Mondale local campaign
Mr. Adalberto Jurado -	Treasurer, Comite Amigos de Jimmy Carter"

Please respond to the following questions for each individual named above separately as well as Mr. Manuel Rodriguez:

- (a) Were your contacts with each individual via telephone, letter, in person or a combination?
- (b) Provide the dates, times and places for your contacts with each individual.

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- (c) State the specific purpose for each contact.
- (d) Name all individuals present at any one meeting concerning your services.

2. Question number 10 propounded to you under order on June 26, 1981, was as follows:

"Submit legible copies of all correspondence, memoranda and other documents in connection with your billings to the Committee concerning the money owed by them to Associates. (include all written documents from all parties including, if applicable, collection agencies)."

Your response was as follows:

"10. At this moment, the Comite Amigos de Jimmy Carter faction owe us \$124,858.37 and the Carter-Mondale Committee owe us \$24,389.50. They kept separate accounts but the people directing the campaign and ordering the placing of the ads were the same. See Exhibits 2 and 3 about the Carter-Mondale Committee Account." (emphasis added).

Please give a detailed statement of what is meant when you say the people directing the campaign and ordering of ads were the same. Include specific examples in your response.

3. Question number 6 posed to you on June 26, 1981, was as follows:

"6. Did Associates provide or assist in the preparation of the text for the Committee? (a) If your response is in the negative, please explain. (b) If your response is in the affirmative, name all individuals involved in the development, preparation, and approval of all media production designed for the Committee on behalf of Jimmy Carter. (In your response, include the address, occupation, principal place of business and phone number of all named individuals.)"

Your response to question number 6 was as follows:

"6. Yes. All text and production was prepared by employees of Associates."

You failed to respond to part b of the above-referenced question. Please provide a detailed response at this time. Include in your response the source(s) from where you received campaign photos,

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statistics, strategy proposals etc., to be used in the development of ads for (a) the Carter-Mondale Committee; and (b) Comite Amigos (answer the question for each Committee separately).

4. Was the Carter-Mondale Committee involved in the development, approval or any other aspect whatever of media purchases paid for by Comite Amigos? Explain your response in detail citing specific examples.
5. Explain in detail why a collection agency was used in an attempt to collect funds owed to you by the Carter-Mondale Committee but no such attempt was used to secure funds owed to you by Comite Amigos.
6. Submit any correspondence between Joe Franco and Associates and the Comite Amigos de Jimmy Carter concerning their outstanding debt.
7. Information in the possession of the Commission indicates that you organized a fundraising activity held in a San Juan Hotel after the 3/26 primary for the purpose of raising money to be credited to the outstanding debt of Comite Amigos. The fundraiser (dance) was purportedly held on July 19, 1980.

Please give a detailed description of the fundraiser, including, but not limited to; whose idea it was, the total cost, who paid up front deposit money, cost of tickets, where the tickets were printed, who sold the tickets (give names and addresses), the individuals involved in the planning and organization of the fundraiser (include names and addresses), and what group(s) of individuals were given the opportunity to purchase tickets.
8. Was any advertising or any type of promotion conducted to announce the fundraiser? If so, provide all written materials and state the names of all persons individually contacted to purchase tickets.
9. Why were no fundraisers held for Carter-Mondale? Explain your answer in detail.
10. Have you ever conducted or participated in any fundraising activity for debts owed you on behalf of a client other than Comite Amigos?

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Questions to Joe Franco
Page 4

11. State your relationship with Adalberto Jurado. How long have you known each other? Is your relationship business, social or both? Explain.
12. Submit example texts of radio and TV spots paid for by the Carter-Mondale Committee as well as Comite Amigos.
13. State the average amount of time between billing and receipt of payment from your political campaign clients and your standard procedures for collecting debts owed to you.

84040481765



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 5, 1982

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Raul Torres Viera, Esquire
P.O. Box 1106
San Juan, Puerto Rico 00902

RE: MUR 1354

Dear Mr. Viera:

On December 14, 1981, you received notification that the Commission had found reason to believe that the Comité Amigos de Jimmy Carter violated 2 U.S.C. § 433 and § 441b, in addition to previous findings of § 434, provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your client to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that your client submit the information under oath and that he does so within fifteen days of your receipt of this subpoena and order.

84040481766

Letter to Raul Viera
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057. In her absence, contact Thomas Whitehead at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

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

Enclosure
Subpoena and Order
Questions

1354 - Callahan

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 ASSIGNED TO:
Raul Torres Viera, Esq.
P.O. Box 1106
San Juan, PR 00902

3. ARTICLE DESCRIPTION:
REGISTERED NO. *ES7236* RECEIVED NO. _____
(Always obtain signature of addressee or agent)

I have received the article described above.
SIGNATURE *[Signature]* DATE OF DELIVERY *APR 14 1984*

4. ADDRESS (check one if not):
☐ UNABLE TO DELIVER BECAUSE

U.S. MAIL SERVICE



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Raul Torres Viera, Esquire
P.O. Box 1106
San Juan, Puerto Rico 00902

RE: MUR 1354

Dear Mr. Viera:

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It is required that your client submit the information under oath and that he does so within fifteen days of your receipt of this subpoena and order.

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Letter to Raul Viera
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057. In her absence, contact Thomas Whitehead at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions

84040481769

Handwritten:
4/1/82

BEFORE THE FEDERAL ELECTION COMMISSION.

Adalberto Jurado)

Comite Amigos de)
Jimmy Carter)

MUR 1354

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within fifteen days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on *Apr. 2*, 1982.

Frank P. Reiche

Frank P. Reiche
Chairman of the Federal
Election Commission

ATTEST:

Marjorie W. Emmons

Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions

84040481770

ATTACHMENT TO ORDER TO ANSWER QUESTIONS

QUESTIONS TO ADALBERTO JURADO

In your responses to the following questions, please differentiate between the Carter-Mondale Committee and Comité Amigos by stating the committee's full name whenever applicable.

1. Who is Manuel Rodriguez? Was he a Committee officer?
2. Did Mr. Rodriguez personally meet with you and/or Joe Franco to approve media proposals? Explain.
3. Did you ever personally go to the Carter-Mondale headquarters? (Explain your response in detail and cite specific examples).
4. Do you know if Mr. Rodriguez ever personally went to the Carter-Mondale headquarters? Explain your response in detail.
5. Do you know of anyone besides Joe Franco who was involved in the development of the media proposals for Comité Amigos? Please detail your response.
6. State the source of any campaign materials, including photos, strategy proposals, statistics, etc., which you considered in connection with media purchases on behalf of Jimmy Carter.
7. In his letter of March 1, 1982 to this Commission, Mr. Raul Torres Viera states in part:

The fact is that Joe Franco and Associates met with these persons to negotiate, not one but two similar contracts, which is completely normal in view that both committees were supporting the same candidate, that member[s] of both committees were democrats, that Mr. Franco has been closely associated for more than 20 years with political campaigning advertising in Puerto Rico for the National Democratic Party, the Republican Party, the New Democratic Party of Puerto Rico and a local political party, and that Mr. Franco knows personally almost everybody within the political scene making him the real and only link between the two committees. page 5 (emphasis added)

Give specific details of the negotiating of the "two similar contracts." Include what information you had access to concerning the Carter-Mondale contract, from whom you received such information, where and when you received the information, and who was present, etc.

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8. Please detail your knowledge of the following individuals including whether your relationship was business, social or both; in what capacity you have dealt with the named individuals including dates, times and places; whether your contact(s) with each was (were) in person, via telephone, or correspondence: (Respond to the question for each individual separately)

Mr. Terry O'Connell - Coordinator for the Campaign in Puerto Rico, Washington, D.C.

Mr. Evan S. Dobelle - National Finance Chairman, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005

Mr. Bob Keefe - National Finance Committee, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005

Mr. Angel Viera Martinez - Attorney of Law, Coordinator of the Carter-Mondale local campaign

9. Did Joe Franco or any of his associates ever mention to you or to your knowledge to Mr. Rodriguez, the strategy, text, development or ideas pertaining to the Carter-Mondale media purchases? Explain your response in detail. Cite examples.
10. State your relationship with Joe Franco. How long have you known him? Is your relationship business, social or both?
11. Did Joe Franco or any of his associates ever discuss with you or anyone else to your knowledge, the possible use of a collection agency against Comite Amigos to collect the outstanding debt owed to him by your committee? Explain your answer.
12. Were you aware that collection proceedings against Carter-Mondale were being conducted by Joe Franco? When did you first become aware of this action? How? Be specific.
13. Whose idea was the fundraising activity which you referred to in your statement of March 1, 1982 as follows:

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After the March 16, 1980 Presidential Primary, Joe Franco and Associates only received payments from democrats on their individual capacities. "Comite Amigos de Jimmy Carter" didn't engage in further activity but individually, as democrats not as a committee, helped Mr. Franco by selling tickets for an activity that was held in a San Juan Hotel, organized by Joe Franco and Associates with the purpose of raising money that would be credited to the outstanding debt of "Comite Amigos". (emphasis added)

Give specific details as to how you learned of the proposed activity, by whom, your participation, etc.

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14. Were any other fundraising activities held to raise money for the Comite Amigos' debt to Joe Franco? Please detail your responses.
 15. Are any fundraising activities planned for the future to reduce the debt owed to Joe Franco by Comite Amigos? Please detail your response.
 16. In your response, dated October 20, 1981, to a Commission order, you state that the tickets to the July 19, 1980 fundraiser were sold to the public at large. What do you mean by the public at large? Be specific.
 17. Was the fundraiser advertised or promoted in any way? Please detail. If any advertising or solicitations whatever were conducted, submit sample materials. If no sample materials are available, describe the materials in detail.
 18. Identify by list, in detail, all Committee records, including; any financial records, bank records, correspondence, media text and any other documents whatever in connection with Comite Amigos activities which are available for Commission inspection with the exception of the invoices which you have previously submitted to the Commission by Comite Amigos.
 19. Submit examples of texts of radio and TV spots and other campaign related materials which Comite Amigos purchased on behalf of Jimmy Carter.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE

FROM: MARJORIE W. EMMONS/JODY CUSTER *JC*

DATE: APRIL 2, 1982

SUBJECT: SUBPOENAS REGARDING MUR 1354

The attached subpoenas regarding MUR 1354, which were Commission approved in Executive Session on March 30, 1982, have been signed and sealed this date.

34040481774

Attachment:
Subpoenas (2)

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Comite Amigos de Jimmy Carter,) MUR 1354
et al.)

CERTIFICATION

I, Marjorie W. Emmons, Recording Secretary for the
Federal Election Commission's Executive Session on March 30,
1982, do hereby certify that the Commission decided by a vote of
6-0 to take the following actions in MUR 1354:

1. Authorize the Subpoena/Order and cover letter
to Adalberto Jurado, in the care of his attorney,
Raul Torres Viera, as submitted with the FEC
General Counsel's March 19, 1982 report and amended
in the meeting.
2. Authorize the Subpoena/Order and cover letter
to Joe Franco in the care of his attorney, Louis
Rodriguez-Bigas, as recommended in the General
Counsel's March 19, 1982 report.

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

Attest:

3/31/82

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

84040431775



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES N. STEELE, GENERAL COUNSEL
FROM: MARJORIE W. ~~ROBERTS~~ JODY CUSTER *Jc*
DATE: MARCH 24, 1982
SUBJECT: OBJECTION - MUR 1354 Memorandum to the Commission
dated 3-19-82; Received in OCS, 3-19-82, 4:01

The above-named document was circulated to the Commission on
March 22, 1982 at 11:00.

Commissioner Aikens submitted an objection at 5:31, March 23,
1982.

This matter will be placed on the agenda for the Executive
Session of Tuesday, March 30, 1982.

84040481776

March 19, 1982

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1354

Please have the attached Memo to the Commission distributed to the Commission on a 48 hour tally basis. Thank you.

Attachment

cc: Callahan

34040431777



SENSITIVE

FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSION SECRETARY

82 MAR 19 P 4: 01

March 19, 1982

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel *[Signature]*

SUBJECT: Authorization to Issue Subpoena/Orders
In Connection With MUR 1354

At issue in this matter is whether expenditures made on behalf of the Carter-Mondale Committee by the Comite Amigos de Jimmy Carter were independent within the meaning of the Act.

The Commission has previously found reason to believe that:

- (a) The Comite Amigos violated 2 U.S.C. § 433, § 434 and § 441b;
- (b) The Carter-Mondale Committee violated 2 U.S.C. § 433, § 434, § 441a(b), and § 441b; and
- (c) Joe Franco and Associates violated 2 U.S.C. § 441b.

Both Joe Franco and Comite Amigos have previously been issued orders to answer questions in connection with this MUR. However, the answers submitted by the respondents have raised additional questions which must be answered prior to our making a further recommendation to the Commission.

The Office of General Counsel recommends that the attached questions be issued under order based on the respondents' past unwillingness to respond in a timely manner.

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Memorandum to the Commission
MUR 1354
Page 2

Recommendations

1. Authorize the attached Subpoena/Order and cover letter to Adalberto Jurado, in the care of his attorney, Raul Torres Viera.
2. Authorize the attached Subpoena/Order and cover letter to Joe Franco in the care of his attorney, Louis Rodriguez-Bigas.

Attachments

Questions (7 pages)
Orders (2 pages)
Notification letters (4 pages)
(13 total pages attached)

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ATTACHMENT TO ORDER TO ANSWER QUESTIONS

QUESTIONS TO ADALBERTO JURADO

In your responses to the following questions, please refer to the Carter-Mondale Committee and Comite Amigos by full name for clarification.

1. Who is Manuel Rodriguez? Was he a Committee officer?
2. Did Mr. Rodriguez personally meet with you and/or Joe Franco to approve media proposals? Explain.
3. Did you ever personally go to the Carter-Mondale headquarters? (Explain your response in detail and cite specific examples)..
4. Do you know if Mr. Rodriguez ever personally went to the Carter-Mondale headquarters? Explain your response in detail.
5. Do you know of anyone besides Joe Franco who was involved in the development of the media proposals for Comite Amigos? Please detail your response.
6. State the source of any campaign materials, including photos, strategy proposals, statistics, etc., which you considered in connection with media purchases on behalf of Jimmy Carter.
7. In his letter of March 1, 1982 to this Commission, Mr. Raul Torres Viera states in part:

The fact is that Joe Franco and Associates met with these persons to negotiate, not one but two similar contracts, which is completely normal in view that both committees were supporting the same candidate, that member[s] of both committees were democrats, that Mr. Franco has been closely associated for more than 20 years with political campaigning advertising in Puerto Rico for the National Democratic Party, the Republican Party, the New Democratic Party of Puerto Rico and a local political party, and that Mr. Franco knows personally almost everybody within the political scene making him the real and only link between the two committees. page 5 (emphasis added)

Give specific details of the negotiating of the "two similar contracts." Include what information you had access to concerning the Carter-Mondale contract, from whom you received such information, where and when you received the information, and who was present, etc.

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8. Please detail your knowledge of the following individuals including whether your relationship was business, social or both; in what capacity you have dealt with the named individuals including dates, times and places; whether your contact(s) with each was (were) in person, via telephone, or correspondence; and your knowledge of each's political activities: (Respond to the question for each individual separately)

Mr. Terry O'Connell - Coordinator for the Campaign
in Puerto Rico, Washington,
D.C.

Mr. Evan S. Dobelle - National Finance Chairman,
Carter-Mondale Presidential
Committee, 1413 K Street,
N.W., Washington, D.C. 20005

Mr. Bob Keefe - National Finance Committee,
Carter-Mondale Presidential
Committee, 1413 K Street,
N.W., Washington, D.C. 20005

Mr. Angel Viera Martinez - Attorney of Law,
Coordinator of the Carter-
Mondale local campaign

9. Did Joe Franco or any of his associates ever mention to you or to your knowledge to Mr. Rodriguez, the strategy, text, development or ideas pertaining to the Carter-Mondale media purchases? Explain your response in detail. Cite examples.
10. State your relationship with Joe Franco. How long have you known him? Is your relationship business, social or both?
11. Did Joe Franco or any of his associates ever discuss with you or anyone else to your knowledge, the possible use of a collection agency against Comite Amigos to collect the outstanding debt owed to him by your committee? Explain your answer.
12. Were you aware that collection proceedings against Carter-Mondale were being conducted by Joe Franco? When did you first become aware of this action? How? Be specific.
13. Whose idea was the fundraising activity which you referred to in your statement of March 1, 1982 as follows:

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After the March 16, 1980 Presidential Primary, Joe Franco and Associates only received payments from democrats on their individual capacities. "Comite Amigos de Jimmy Carter" didn't engage in further activity but individually, as democrats not as a committee, helped Mr. Franco by selling tickets for an activity that was held in a San Juan Hotel, organized by Joe Franco and Associates with the purpose of raising money that would be credited to the outstanding debt of "Comite Amigos". (emphasis added)

Give specific details as to how you learned of the proposed activity, by whom, your participation, etc.

- 84040481782
14. Were any other fundraising activities held to raise money for the Comite Amigos' debt to Joe Franco? Please detail your responses.
 15. Are any fundraising activities planned for the future to reduce the debt owed to Joe Franco by Comite Amigos? Please detail your response.
 16. In your response, dated October 20, 1981, to a Commission order, you state that the tickets to the July 19, 1980 fundraiser were sold to the public at large. What do you mean by the public at large? Be specific.
 17. Was the fundraiser advertised or promoted in any way? Please detail. If any advertising or solicitations whatever were conducted, submit sample materials. If no sample materials are available, describe the materials in detail.
 18. Identify by list, in detail, all Committee records, including; any financial records, bank records, correspondence, media text and any other documents whatever in connection with Comite Amigos activities which are available for Commission inspection with the exception of the invoices which you have previously submitted to the Commission by Comite Amigos.
 19. Submit examples of texts of radio and TV spots and other campaign related materials which Comite Amigos purchased on behalf of Jimmy Carter.

ATTACHMENT TO ORDER TO ANSWER QUESTIONS

QUESTIONS TO JOE FRANCO

In your response to each of the following questions, please differentiate between the Carter-Mondale Committee and Comité Amigos by stating the committee's full name whenever applicable.

1. On June 26, 1981, you were issued an Order by the Commission which propounded 14 questions. Question number 2 was as follows:

- "2. State the name and address of each person who was involved in any way in negotiating the contract between Associates and the Committee."

Your response to the above question was as follows:

- "2. The persons involved in the negotiation to contract our services for the Carter-Mondale Presidential Committee were:

Mr. Terry O'Connell -	Coordinator for the Campaign in Puerto Rico, Washington, D.C.
Mr. Evan S. Dobelle -	National Finance Chairman, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005
Mr. Bob Keefe -	National Finance Committee, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005
Mr. Angel Viera Martinez -	Attorney of Law, Coordinator of the Carter- Mondale local campaign
Mr. Adalberto Jurado -	Treasurer, Comité Amigos de Jimmy Carter"

Please respond to the following questions for each individual named above separately as well as Mr. Manuel Rodriguez:

- (a) Were your contacts with each individual via telephone, letter, in person or a combination?
- (b) Provide the dates, times and places for your contacts with each individual.

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- (c) State the specific purpose for each contact.
- (d) Name all individuals present at any one meeting concerning your services.

2. Question number 10 propounded to you under order on June 26, 1981, was as follows:

"Submit legible copies of all correspondence, memoranda and other documents in connection with your billings to the Committee concerning the money owed by them to Associates. (include all written documents from all parties including, if applicable, collection agencies)."

Your response was as follows:

"10. At this moment, the Comite Amigos de Jimmy Carter faction owe us \$124,858.37 and the Carter-Mondale Committee owe us \$24,389.50. They kept separate accounts but the people directing the campaign and ordering the placing of the ads were the same. See Exhibits 2 and 3 about the Carter-Mondale Committee Account." (emphasis added).

Please give a detailed statement of what is meant when you say the people directing the campaign and ordering of ads were the same. Include specific examples in your response.

3. Question number 6 posed to you on June 26, 1981, was as follows:

"6. Did Associates provide or assist in the preparation of the text for the Committee? (a) If your response is in the negative, please explain. (b) If your response is in the affirmative, name all individuals involved in the development, preparation, and approval of all media production designed for the Committee on behalf of Jimmy Carter. (In your response, include the address, occupation, principal place of business and phone number of all named individuals.)"

Your response to question number 6 was as follows:

"6. Yes. All text and production was prepared by employees of Associates."

You failed to respond to part b of the above-referenced question. Please provide a detailed response at this time. Include in your response the source(s) from where you received campaign photos,

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statistics, strategy proposals etc., to be used in the development of ads for (a) the Carter-Mondale Committee; and (b) Comite Amigos (answer the question for each Committee separately).

4. Was the Carter-Mondale Committee involved in the development, approval or any other aspect whatever of media purchases paid for by Comite Amigos? Explain your response in detail citing specific examples.
5. Explain in detail why a collection agency was used in an attempt to collect funds owed to you by the Carter-Mondale Committee but no such attempt was used to secure funds owed to you by Comite Amigos.
6. Submit any correspondence between Joe Franco and Associates and the Comite Amigos de Jimmy Carter concerning their outstanding debt.
7. Information in the possession of the Commission indicates that you organized a fundraising activity held in a San Juan Hotel after the 3/26 primary for the purpose of raising money to be credited to the outstanding debt of Comite Amigos. The fundraiser (dance) was purportedly held on July 19, 1980.

Please give a detailed description of the fundraiser, including, but not limited to; whose idea it was, the total cost, who paid up front deposit money, cost of tickets, where the tickets were printed, who sold the tickets (give names and addresses), the individuals involved in the planning and organization of the fundraiser (include names and addresses), and what group(s) of individuals were given the opportunity to purchase tickets.
8. Was any advertising or any type of promotion conducted to announce the fundraiser? If so, provide all written materials and state the names of all persons individually contacted to purchase tickets.
9. Why were no fundraisers held for Carter-Mondale? Explain your answer in detail.
10. Have you ever conducted or participated in any fundraising activity for debts owed you on behalf of a client other than Comite Amigos?

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Questions to Joe Franco
Page 4

11. State your relationship with Adalberto Jurado. How long have you known each other? Is your relationship business, social or both? Explain.
12. Submit example texts of radio and TV spots paid for by the Carter-Mondale Committee as well as Comite Amigos.
13. State the average amount of time between billing and receipt of payment from your political campaign clients and your standard procedures for collecting debts owed to you.

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BEFORE THE FEDERAL ELECTION COMMISSION

Adalberto Jurado)

Comite Amigos de)
Jimmy Carter)

MUR 1354

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within fifteen days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on , 1982.

Frank P. Reiche
Chairman of the Federal
Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions

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BEFORE THE FEDERAL ELECTION COMMISSION

Joe Franco) MUR 1354

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within fifteen days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on , 1982.

Frank P. Reiche
Chairman of the Federal
Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Raul Torres Viera, Esquire
P.O. Box 1106
San Juan, Puerto Rico 00902

RE: MUR 1354

Dear Mr. Viera:

On December 14, 1981, you received notification that the Commission had found reason to believe that the Comité Amigos de Jimmy Carter violated 2 U.S.C. § 433 and § 441b, in addition to previous findings of § 434, provisions of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your client to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that your client submit the information under oath and that he does so within fifteen days of your receipt of this subpoena and order.

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Letter to Raul Viera
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057. In her absence, contact Thomas Whitehead at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions

84040481790

//



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Luis Rodriguez-Bigas, Esquire
GPO Box 5072
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Rodriguez-Bigas:

On December 14, 1981, you received notification that the Commission had found reason to believe that Joe Franco and Associates violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended. An investigation of this matter is being conducted and it has been determined that additional information from your client is necessary.

Consequently, the Federal Election Commission has issued the attached subpoena and order which requires your client to provide information which will assist it in carrying out its statutory duty of supervising compliance with the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26, U.S. Code.

It is required that your client submit the information under oath and that he does so within fifteen days of your receipt of this subpoena and order.

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Letter to Luis Rodriguez-Bigas
Page 2

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057. In her absence, contact Thomas Whitehead at (202) 523-4000.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure
Subpoena and Order
Questions

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BUFETE DE
MELLENDEZ PEREZ & RODRIGUEZ BIGAS
EDIFICIO EL CARIBE, PISO 14
AVENIDA LAS PALMERAS
SAN JUAN, PUERTO RICO

ERNESTO A. MELLENDEZ PEREZ
LUIS RODRIGUEZ BIGAS

TEL. (809) 725-2222
APARTADO 5072
OFICINA POSTAL GENERAL
SAN JUAN, PUERTO RICO 00936

March 9, 1982

Ms. Suzanne Callahan
Federal Election Commission
Washington, D. C. 20463

RE: MUR 1354

Dear Ms. Callahan:

Recently Joe Franco & Associates, Inc. (hereafter Associates), designated the undersigned as its counsel in relation to the above referenced matter.

The factual and legal analysis of the General Counsel which recommends that the Commission find reason to believe that Joe Franco & Associates violated 2 USC 441b, appears to be based on the conclusion that Associates extended credit to Comité Amigos and the Carter-Mondale Committee outside the normal course of business. Perhaps it might seem so, but definitely the granting of credit for political advertising by this particular advertising agency is within its normal course of business.

Joe Franco & Associates has been handling a major part of the New Progressive Party's (NPP) advertising and that of many of its candidates, since the late sixties and early seventies. Although ideally, political advertising should be paid in advance, locally, the practice is that you try to collect in advance as much as you can. The people that handled Carter/Mondale's campaign in Puerto Rico, as well as the Comité Amigos, have been doing business with Associates that way for many years.

We call your attention to the fact that Comité Amigos' invoices in February 1980 were \$40,750.24 and on February 27, 1980 a payment of \$35,000 was made. Subsequently, on March 4, 1980 another \$20,000 was paid. Associates had reason to believe that based on past experience and considering that it had been paid \$55,000 within one week, Comité Amigos would pay in full its bills.

It was not and it is not Associates' intention to violate any federal statute nor did it intend to make any unauthorized

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contribution to any candidate or committee by granting credit. As a matter of fact Joe Franco & Associates, Inc. has actively tried to collect the money it is owed. For instance, we call your attention to an action filed by Associates in U. S. District Court for the District of Puerto Rico for the collection of \$24,389.50 it is owed by Carter/Mondale Presidential Committee, Inc., Joe Franco & Associates, Inc. vs. Carter/Mondale Presidential Committee, Inc., Civil 80-2169. In said case we obtained judgment, copy of which we enclose. Supposedly Joe Franco & Associates was also to be paid in advance but expenditures were made up to \$63,624.50 on behalf of the Committee. We are enclosing herewith copies of various collection letters sent by Associates to the Committee's National Finance Chairman, Evan S. Dobelle, and the only answer received from Mr. Dobelle. Upon receipt of Mr. Dobelle's letter, (which as you can see doesn't really states a position) Associates decided to take legal action to collect the balance owed.

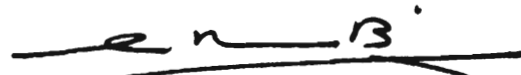
The Comité Amigos story is just about the same as that of Carter Mondale. Active efforts towards collection are still being made through fund-raisers, etc.

Joe Franco & Associates, Inc. is a small agency that depends to a great extent on political and governmental agencies advertising. It is a for profit organization. Perhaps a business judgment mistake was made. Certainly we believe that the decisions taken in both cases were not outside its normal course of business.

We respectfully request that based on the foregoing the office of the General Counsel reconsider its recommendation to the Commission and instead that it recommend that no violation has been committed.

If any further information or documentation is needed, please don't hesitate to ask us.

Very truly yours,


Luis Rodriguez Bigas

34740481791

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

82 MAR 15 P 2: 23

JOE FRANCO & ASSOCIATES, INC. '

Plaintiff ' ✓

vs ' CIVIL 80-2169

CARTER/MONDALE PRESIDENTIAL
COMMITTEE, INC. 'Defendant '

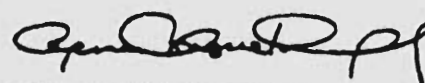
FEB 14 28 PM '82
U.S. DISTRICT COURT
SAN JUAN, P.R.

JUDGMENT

Having considered the report filed by Magistrate Arenas on January 15, 1982, Judgment is entered in accordance with the oral stipulation presented by the parties and consequently defendant Carter/Mondale Presidential Committee, Inc. is ORDERED to pay plaintiff Joe Franco & Associates, Inc. the sum of \$24,389.50, without costs. This Judgment becomes final, as agreed by the parties, upon its entry.

SO ORDERED AND ADJUDGED.

At San Juan, Puerto Rico, on February 4, 1982.



CARMEN CONSUELO CEREZO
United States District Judge

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CARTER/MONDALE PRESIDENTIAL COMMITTEE, INC.
P.O. BOX 500, WASHINGTON, D.C. 20044 (202) 347-9000

April 24, 1980

Joe Franco and Associates
1120 Ashford Avenue
San Juan, Puerto Rico 00907

Dear Joe,

I have in hand your letter of April 18, 1980.

With every deference, and documentation and witnesses available, I authorized \$30,010 in expenditures in behalf of the Carter/Mondale Presidential Committee (enclosed).

I received your additional invoices not validated by me and in fact in force before I ever came to Puerto Rico, for the sake of bringing them to the attention of Angel Viera Martinez and Donna Sagemiller.

I apologize for the inability to reach me personally due to my extensive travel and I hope this letter finds you and your colleagues well.

I appreciate the kindness and professionalism extended to me during my stay on the Island.

My very best wishes.

Sincerely,



Evan S. Dobelle
National Finance Chairman

84040481796

Advertising

JOE FRANCO & ASSOCIATES, Inc.

Public Relations

April 18, 1980

Mr. Evan S. Dobelle
National Finance Chairman
Carter/Mondale Presidential Committee, Inc.
1413 K Street N. W.
Washington, D. C. 20005

Dear Mr. Dobelle:

We received today partial payment for the invoices previously approved to you dealing with the Carter/Mondale Committee participation in our Presidential Primary in Puerto Rico last March 16.

As you may recall, you approved a total amount of \$63,614.50 after reviewing the different invoices with Mr. Angel Viera Martínez, Carter Campaign Coordinator in Puerto Rico and with Mr. Virgilio Ramos, who was acting as liason for the Carter Campaign with the Governor of Puerto Rico.

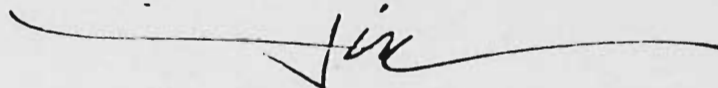
The balance of \$33,614.50 still due belongs to bonafide invoices rendered on behalf of President Carter Campaign in Puerto Rico.

We have made a number of calls to your office and to Donna Sagmiller's office requesting payment in total because as you know, we have already paid the local media involved.

This is a big bill for us to pay when we did our work with maximum effort and dedicated long hours to the campaign. I am sure it is not your intention to withhold payment from us and I would greatly appreciate if you give this matter your personal attention so that your share is fully paid at the earliest convenience.

We thank you for all your help and hope we can serve you again in the future.

Sincerely,



Joe Franco
President

cg

cc Mr. Tim Kraft, National Campaign Manager
Mr. S. Lee Kling
Lcdo. Angel Viera Martinez
Lcdo. Virgilio Ramos

84040481797

Advertising

JOE FRANCO & ASSOCIATES, Inc.

Public Relations

May 22, 1980

Mr. Evan Dobelle, National Finance Chairman
CARTER-MONDALE PRESIDENTIAL-COMMITTEE, INC.
P.O. Box 500
Washington, D.C. 20044

Dear Mr. Dobelle:

I hereby acknowledge your letter of April 24, 1980 addressed to our President, Mr. Joe Franco, responding to our various requests for settlement of the total outstanding debt of \$63,624.50, due us for services and expenditures on behalf of the local Carter-Mondale Presidential Primary held here last March.

I surely do not understand the meaning and implications contained in the third paragraph of your letter, whereby you refuse to validate various invoices against your account worth \$33,614.50.

The total package for services rendered, worth \$63,624.50, was discussed and accepted by you for immediate payment (within a week) at the meeting held in our Conference Room, in the presence of Mr. Virgilio Ramos, Esq., liaison for Governor Romero Barceló; Mr. Viera Martínez, Esq., Local Campaign Coordinator for Carter-Mondale and Miss Irma Gómez, our General Manager. You did take those invoices back with you to Washington.

We have furtherly discussed this matter with Messrs. Ramos and Viera Martínez and they both feel surprised at the apparent decision of both you and the Carter Mondale Presidential Committee of not honoring said outstanding debt. They surely do not understand your intentions noting that more than \$170,000 were raised locally for the Carter-Mondale campaign.

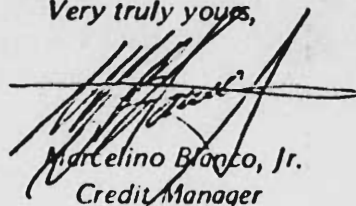
For us, as an advertising agency, this overall outstanding balance has dealt a heavy blow to our "cash flow" and our credit reputation with our local media. Beside your problem, we must also face the fact that your local Friends of Jimmy Carter organization has been unable to raise enough funds to cover the debt owed us. Total outstanding debt of Friends of Jimmy Carter Committee as of now still remains well over \$163,000, for advertising and printings on behalf of President Carter during the Puerto Rico Presidential Primary of March 16th.

84040481798

The Carter Campaign in Puerto Rico was a difficult one for us, since it is well known that the Kennedy people managed to raise locally well over \$400,000 that were pumped into a sophisticated campaign against us. Being aware of the importance of a Carter victory here before the Illinois Primary, this agency didn't hesitate to use all available resources of our own to win this very important victory.

We surely hope that our dedication and our efforts beyond the normal call of duty of an advertising agency, be duly compensated with at least payment of these expenses that were legitimately honored to the media from our resources.

Very truly yours,



Marcelino Blanco, Jr.
Credit Manager

cc: Mr. Virgilio Ramos, Esq.
Mr. A. Viera Martínez, Esq.

84040481799

Advertising

JOE FRANCO & ASSOCIATES, Inc.

Public Relations

June 19, 1980

Mr. Evan S. Dobelle
National Finance Chairman
Carter/Mondale Presidential Committee, Inc.
1413 K Street N.W.
Washington, D.C. 20005

Dear Mr. Dobelle:

In May 22, 1980 we wrote you regarding the invoices for advertising rendered on behalf of President Carter by this ad agency which are still due for payment.

At this writing we have not received a word on this matter.

Frankly speaking we feel that we do not deserve this kind of treatment, since you know better than anybody that this agency's financial resources were vital for the cause of helping the President win the Puerto Rico Democratic Primary.

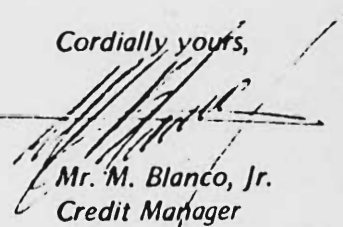
When you accepted the invoices for payment, it was your personal promise to send the check for \$63,300.00 within a week. We only received a check for \$30,000.00.

To tell you the truth, we can't wait much longer and we hopefully expect to receive the balance due within the next 10 days.

We extended credit to you in good faith...and now we expect to be reciprocated in the same manner.

7-3 Liberals

Cordially yours,



Mr. M. Blanco, Jr.
Credit Manager

cc. Mr. Tim Kraft, National Campaign Mngr.
Mr. S. Lee Kling
Mr. Virgilio Ramos, Esq.
Mr. A. Viera Martínez, Esq.

Public Relations

MERCANTIL PLAZA BLDG.
SUITE 1810
HATO REY, PUERTO RICO 00918

Raúl Tomás Viera
ABOGADO - NOTARIO
ATTORNEY AT LAW

20676

RECEIVED

82 MAR 5 P2:03
SAN JUAN, PUERTO RICO 00902
TELE.: 753-7430 • 753-7432

Doc# 7287

March 1, 1982

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

RE: MUR 1354

Dear Mr. Steele:

According to your letter dated February 17, 1982, and on behalf of my client, Mr. Adalberto Jurado, Former Treasurer of "Comité Amigos de Jimmy Carter", I am forwarding to you respondent's reply to the factual and legal analysis made by the Commission's General Counsel Office upon which the Commission based its findings of reason to believe that the Committee violated 2 USC S 434, 2 USC S 433 and 2 USC S 441(b).

Respondent would like to reaffirm his stand that it is of utmost importance to have access and be notified of all the information, documents or statements made by any other persons which served or may serve as basis to the General Counsel's factual and legal analysis. The mere fact that such information could be available to the respondent in a more advanced stage of the proceedings or even afterwards precludes the respondent, at this stage, of challenging and rebutting the facts adequately.

The confidentiality provision invoked by the Commission in 2 USC S 437 g (a)(12)(A), reads that "any notification or investigation made under this section shall not be made public by the Commission or by any person without the written consent of the person receiving such notification or the person with respect to whom such investigation is made. (Emphasis supplied)

It is clear from the reading of the confidentiality provision abovementioned that it is only aimed at the general public and not at the respondent, which in this case is the person with respect to whom such investigation is all about. To deny respondent the full knowledge of the information utilized against him, using a confidentiality provision which is not aimed at him, as the party under investigation but to the general public, is to deny and deprive him of his due process of law under the U.S. Constitution.

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32 MAR 5 P2:03

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82 MAR 5 P2: 03

Nevertheless, and making express reserve to eventually assert and claim the protection of his constitutional rights on the proper forum, respondent will now enter into the particular provisions of law, allegedly infringed by him.

In March 19, 1981, the Commission notified the respondent that there were reasons to believe that he violated S 434(A)(4), 434(b)(6)(B)iii and S 434(b)(8).

According to the General Counsel factual and legal analysis dated March 20, 1981, the Committee failed to file the year end report in violation of S 434(a)(4), the July 15th, October 15th, 12 day pre-general election report and the 30 day post election reports on July 22nd, October 22nd, October 29, 1980 and January 23, 1981.

Section 434(a)(4) states that independent Committees shall file.

"... (A)i quarterly reports, in a calendar year in which a regularly scheduled general election is held, which shall be filed no later than the 15th day after the last day of each calendar quarter; except that the report for the quarter ending on December 31 of such calendar year shall be filed no later than January 31 of the following calendar year."

"...(A)ii pre election report, which shall be filed no later than the 12th day before (or posted by registered or certified mail no later than the 15th day before) any election in which the Committee makes a contribution to or expenditure on behalf of a candidate in such election, and which shall be complete as of the 20th day before the election."

"...(A)iii a post general election report, which shall be filed no later than the 30th day after the general election and which shall be complete as of the 20th day after such general election, and ..."

Respondent has been constantly reaffirming that "Comité Amigos de Jimmy Carter" was and independent Committee officially organized on February 19, 1980 that worked exclusively in support of candidate Jimmy Carter for the March 16, 1980 Democratic Party Presidential Primary held in Puerto Rico. After that date, the Committee ceased operations and engaged in no further political activity due to the fact that Puerto Ricans don't participate in general elections. We make reference to respondent's letter to the Commission of April 8, 1981, Paragraph 2, 5, 7, 10 and 14. (A copy of this letter is hereby annexed as Exhibit 1).

Reference is also made to respondent's letter to the Commission dated May 15, 1981, particularly to Paragraph 5. (A copy of this letter is hereby annexed as Exhibit 2).

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Reaffirming the abovestated as the factual reality and also, the previously stated fact, that Puerto Ricans although American citizens by birth do not enjoy the privileges of voting for the President and Vice President of the United States in general elections and though were limited to campaign in Puerto Rico for the March 16, 1980 Presidential Primary for the selection of delegates to the August National Democratic Convention. It can be understood, how a literal and inflexible application of S 434 (a) 4 reporting provisions of the Act to this case does not correspond to the Puerto Rican reality.

All the relevant information which covered the period of existence of the Committee was filed in the report which covered the period from March 1st to April 30th, 1980, and corresponded to the quarterly report requested by S 434 (a) 4 (A)(i) of the Act. That information included contributions accepted as of February, 1980. (Copy of said report is hereby annexed as Exhibit 3).

The pre-election report referred to in Section 434(a) 4 (A)ii refers to information covering the period preceeding an election. If for the purpose of this section "election" means according to S 431(1)(c), a primary election held for the selection of delegates to a convention. The April 30, 1980 report filed with the Commission adequately reflects the information covered by such period, since that quarterly report covers the activity of the Committee since its organization in February, 1980 until the "election" date of March 16, 1980.

If "election" means, for the purpose of 2 USC S 434(a) 4 (A)ii, "a general election" which is what the office of the General Counsel states it means on its factual and legal analysis dated March 20, 1981, then, this provision seems logical and practical to be applied to independent committees throughout the United States, where voters do participate in general elections and where committees continue in existence at least until the general election is over, but has no practical nor logical application in Puerto Rico where the Committee ceased to exist on March 16, 1980 and where Puerto Ricans have no participation on general elections.

The same reasoning is perfectly valid to the application of S 434(a)(4)(A)iii where the law clearly states that it refers to a post general election and not to any other kind of election.

The Commission received from the Committee on its April 30 report, adequate information related to the Committee's activities from February until April 30 and no other report would have furnished the Commission with relevant information that according to the law refers to a "general election" in which the Committee simply could not participate. Additional information requested by the Commission has been supplemented after that date and we feel the Commission has received from the Committee all the information it needed to exercise its supervisory functions according to the law. To maintain a position that the Committee has not literally complied with the letter of the law, as that letter of the law is interpreted by the General Counsel Office, will not be helpful nor it will attain any useful purpose. Our position is and has always been that eventhough respondent may have misinterpreted the law in good faith, he has furnished the

Commission with the fullest disclosure possible. On the same General Counsel's factual and legal analysis dated March 20, 1981, the General Counsel also stated that the Committee violated S 434(b)(6)(B)iii by not filing an independent expenditures notarized schedule E, reporting the particulars of its independent activity.

He also states that the Committee violated S 434(b)(8) by failing to disclose the status of its outstanding debt with the Joe Franco and Associates.

In a previous letter to the Commission dated April 8, 1981, (copy of which is enclosed as Exhibit 1), respondent addressed that issue by stating that he had not received a notarized schedule E blank form from the Commission to fill out and that if he had received such a form he would have filed it. Nevertheless, the information regarding the contributions, expenses and the outstanding debt have been furnished to the Commission through the course of this proceedings. (See all the explanatory letters answered by the respondent to the Commission as requested) The Commission already has on its possession all the information available from the respondent.

According to its latest communication dated December 14, 1981, the Commission found reasons to believe that the Committee had also violated S 433 and S 441(b). The basis for this findings are sustained by the latest General Counsel office factual and legal analysis.

The factual analysis is incorrect and by that reason so are its legal conclusions.

The General Counsel Office tends to believe incorrectly, that the Carter-Mondale Committee and "Comité Amigos de Jimmy Carter" where either two separate authorized committees or one and the same thing.

The General Counsel Office could not assert that fact, either in a direct or indirect manner, if it doesn't have substantial evidence in the record that objectively would lean its judgment toward that conclusion.

The record shows it different.

"Comité Amigos de Jimmy Carter" was organized as an independent committee and as such it has been treated by the General Counsel office when it applies to the Committee the reporting provisions of the law applicable to other political committees not "authorized committees". (See March 20, 1981 factual and legal analysis).

The General Counsel Office, notwithstanding that, relies on an Affidavit sworn by Joe Franco, President of Joe Franco and Associates to establish that speculative link.

According to said Affidavit, Mr. Franco have said that the people ordering the ads by Carter-Mondale Committee and "Comité Amigos" were one in the same. That asseveration is not correct. "Amigos de Jimmy Carter" by themselves and separately from Carter-Mondale Committee made the oral arrangement for the "Amigos de Jimmy Carter" campaign.

The fact is that Joe Franco and Associates met with these persons to negotiate, not one but two similar contracts, which is completely normal in view that both committees were supporting the same candidate, that member of both committees were democrats, that Mr. Franco has been closely associated for more than 20 years with political campaigning advertising in Puerto Rico for the National Democratic Party, the Republican Party, the New Democratic Party of Puerto Rico and a local political party, and that Mr. Franco knows personally almost everybody within the political scene making him the real and only link between the two committees.

Evidence in the record to support the independence of both committees is abundant.

Both kept separate accounts with Mr. Franco and both were billed separately by him. Note that Mr. Franco filed a civil suit against Carter-Mondale Committee for the collection of around \$31,000 thousand dollars owed to him by Carter-Mondale Committee for their campaigning in Puerto Rico, acknowledging by that that they are different committees. If he thought the contrary he would have sued "Comité Amigos" in the same suit and for both debts. The reports made by both to the Commission were separate. The offices and warehouse for materials were separate. Bank accounts, telephone numbers were different. We understand that there is in the records of the Commission a statement made by the Carter-Mondale Committee establishing that "Comité Amigos" was an unauthorized committee. The reason is and has always been that they were different organizations who worked toward a common goal, the selection of Jimmy Carter as Presidential Candidate in the National Democratic Convention.

After the March 16, 1980 Presidential Primary, Joe Franco and Associates only received payments from democrats on their individual capacities. "Comité Amigos de Jimmy Carter" didn't engaged in further activity but individually, as democrats not as a committee, helped Mr. Franco by selling tickets for an activity that was held in a San Juan Hotel, organized by Joe Franco and Associates with the purpose of raising money that would be credited to the outstanding debt of "Comité Amigos".

It was not an activity made by the Committee but on the initiative of Mr. Franco with the help of many bonafide democrats where he collected an additional amount of money that lowered the outstanding debt to around \$124,000 dollars. Respondent is willing to help Mr. Franco on his individual capacity as a democrat, in any activity made or to be made by Joe Franco and Associates in order to collect money to keep lowering the outstanding debt.

Now, Joe Franco and Associates has failed to collect the amount owed to him by the Carter-Mondale Committee (see our previous reference to the civil suit filed against the Carter-Mondale Committee) and it is understandable that they would like to collect both debts jointly.

The reality is clear from the record, except for the statement made by Mr. Franco that says that the people ordering the ads were one and the same. Said statement contradicts itself because it also says that each committee had separate accounts, that each committee owed different amounts of money and that Mr. Franco's own people were responsible for preparing the texts and production of both committees campaign. It is clear that "Comité Amigos" was an independent committee and that no violation of S 433 has occurred as alleged.

It is the General Counsel Office who has the weight of the evidence to prove that there is indeed a violation to the law and not the respondent.

Now respondent will address the General Counsel finding that Committee violated S 441(b).

This alleged violation is based on an inaccurate statement.

"Amigos de Jimmy Carter" account was run fully on credit basis. Like other accounts on the political campaign field in Puerto Rico were his agency is specialized.

According to the recorded statements made by Joe Franco and Associates the General Counsel Office deducted that an extension of credit outside the normal course of business was made by such agency and by that a corporate contribution was accepted by the Committee in violation of S 441(b). Respondent has already stated that such statement is not correct. The true fact is that Joe Franco and Associates, who knows everybody in political campaigning in Puerto Rico, has served in political campaign advertisement for more than twenty years and that it is and has always been his normal course of business to extend credit to political organizations. He has done it in the past and did it again in this Presidential Primary. It is of particular interest to take a look at Joe Franco and Associate's invoices to see that from the start he was billing after the service was rendered. See for example Page 1 of Invoice No. 80-3-7P dated March 19, 1980 in which he billed for services rendered during the preceeding month of February.

If you examine the Joe Franco and Associates Invoices already in possession of the Commission, you will find that all the activity was done between February and March 1980, with no further activity done afterwards.

It is my most considerable opinion that any conflictive report in possession of the Commission should be confronted so that the true facts will readily emerge.

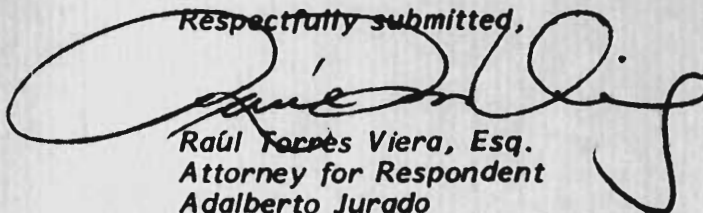
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Mr. Charles N. Steele
March 1, 1982
Page -7-

Respondent respectfully asks the Commission to take careful consideration of all the evidence in the record and prays the Commission to close this matter under review without further proceedings.

In San Juan, Puerto Rico, March 1, 1982.

Respectfully submitted,



Raúl Torres Viera, Esq.
Attorney for Respondent
Adalberto Jurado
(Former Treasurer Comité Amigos
de Jimmy Carter)
P.O. Box 1106
San Juan, Puerto Rico 00902
Tel. (809) 753-7430

Enclosure

/omh

84040481893

EXAMINED RECEIVED

82 MAR 5 P2: 03

April 8, 1981

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington, D. C. 20463

Dear Mr. McGarry:

Reference is made to your letter dated March 20, 1981, and received by me on April 1, in which you notify me that the Commission made a determination of reason to believe that "Comité Amigos de Jimmy Carter" supposedly infringed the following provisions of the Federal Elections Campaign Act: 434 (a) (4), 434 (b) (6) (iii) and 434 (b) (8).

First of all, I would like to make clear that "Comité Amigos de Jimmy Carter" an unauthorized committee, was formed on February 19th, 1980 for the only purpose of supporting candidate Jimmy Carter in the March 16, 1980 Democratic Presidential Primary in Puerto Rico in view of the heavy spending campaign on behalf of Senator Edward Kennedy in Puerto Rico thru and independent Committee, as far as I have been informed.

It was the first time that my friends and myself took part in such process. I was not acquainted with the Federal Election Campaign Act nor its interpretation.

As you know, we the people of Puerto Rico are american citizens by birth, but do not have the right to vote for the President nor the Vice President of the United States under the present Commonwealth status.

So, the committee's work limited to fund-raising and campaigning only for the March 16, 1980 Presidential Primary for the selection of the delegates to the August National Democratic Convention.

34040431802

The outcome of the March 16, 1980 Presidential Primary was 886,144 votes. President Carter got 21 delegates and Senator Kennedy 20 to the National Convention.

- ✓ The independent committee "Amigos de Jimmy Carter" extinguished the same day the primary was held and it didn't participate in any further political activity because since we don't vote for the President, we don't have in Puerto Rico presidential campaign. We just campaign for the primary and that's all.

I made the reports according to the general information which I recieved in the blank forms provided by the Federal Election Commission, being the last one on April 30, 1980.

I never recieved a notarized schedule E blank form from the Commission to fill, if I had recieved such a form I would have filed it with the Commission.

- ✓ "Amigos de Jimmy Carter" was an independent committee made up of volunteers only, just to help in President's campaign until the March 16, 1980 primary, without no economic interest nor any other purpose whatsoever.

The substantial part of the money raised came from the people's small contributions of nickels, dimes, quarters and one dollar bills in mass activities such as radio marathons, can collections in the streets, sales of refreshments and snacks and so forth.

This independent committee hired Joe Franco & Associates only for the primary campaign in relation to T.V., Radio, newspaper advertisements and so forth on a credit basis.

These expenses amounted to \$218,099.74 and when we finished all our activities on exactly the same day of the March 16, 1980 primary, we had an outstanding debt with Joe Franco & Associates for \$159,099.74.

- ✓ From the primary on, "Amigos de Jimmy Carter" independent committee didn't make any other activity nor did raise any money at all.

I suppose that the democrats from Puerto Rico will individually help to pay for this outstanding debt to Joe Franco & Associates.

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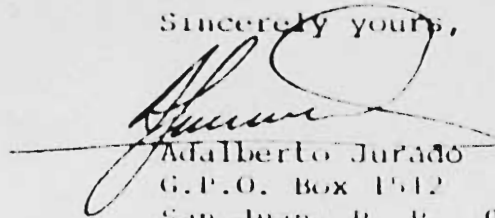
I, nor the independent committee have had no intention to violate any provision of the Federal Law so I shall comply with all the requirements of the Federal Election Commission.

I need more time to answer your questions and to gather all the information and documents as has been requested. Therefore, I request an extension of at least 30 days to put everything up to date according to your letter dated March 20, 1981.

For your information the committee closed operations by March 16, 1980 primary.

Hoping this letter will give you an idea of what this independent committee was and what it did, and expecting that you'll grant me the extension requested to comply with your inquiries, I remain

Sincerely yours,



Adalberto Jurado
G.P.O. Box 1512
San Juan, P. R. 00936

34040481811

May 15, 1981

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Mr. McGarry:

Within the extension of time granted, I am forwarding you the information requested by the Commission's Order, dated 20th of March, 1981.

In addressing items 1, 2, & 3, I would first like to establish that I did commit an error by placing the \$12,729.32 sum as "independent expenditures", on the report of receipts and expenditures dated April 10, 1980.

The \$218,099.74 were expenses made advocating the nomination of candidate Jimmy Carter for the March 16, 1980 Presidential Primary. They were made without the cooperation, consultation or suggestions of an authorized committee or an agent of the candidate. They should have been placed in the report as "independent expenditures" according to 2 USC § 431(f).

All these were contracted to Joe Franco and Associates, a local advertising agency. I am accompanying an updated breakdown of the status of the Joe Franco debt that includes an itemized schedule of the services provided and is hereby annexed as Exhibit A.

✓ Since March 16, 1980, date in which "Comité Amigos de Jimmy Carter" closed operations, a group of democrats on their individual capacities, and without any connection with the Committee, have paid Mr. Franco an additional amount of \$34,241.37 dollars to be credited to the outstanding debt and which stands as of this letter at \$124,858.37.

The \$12,729.32 originally reported as independent expenditures were really operational expenses. Such expenses include rental of office space, transportation, food, lodging, gasoline, utilities, painting and refurbishing of offices and related expenses. I felt such expenses were not directly aimed at the nomination of the candidate, but were expenses made in order to keep running the administrative phase of the operation. A schedule is hereby annexed as Exhibit B.

My answer to items 4, 6 & 7 is in the negative. In relation to item 5 the "Comité Amigos de Jimmy Carter" officials were:

Manuel M. Perez Rodríguez, President
Antonio Alfonso, Secretary
Adalberto Jurado, Treasurer

84040481812

Mr. John Warren McG

Page - 2

May 15, 1981

Any of us have been engaged in previous political activity. The rest of the personnel was exclusively made up of volunteers. They received no salary, but we did pay certain expenses for them such as food, lodge, transportation, etc., when needed.

I feel the answer to items 8 & 9 was already given in my letter to the Commission dated April 8, 1981. There I stated that the money raised came from the people's small contributions of nickels, dimes, quarters and one dollar bills in mass activities held such as radio marathons, can collections in the streets, sales of refreshments and snacks, etc. Beside those, I reported to the Commission a list of individual contributions on the "Itemized Receipts Schedule A" report previously filed.

I hope this information fully complies with your request and that this matter would be settled and cleared without further proceedings, once the error I committed is corrected.

Sincerely yours,

Adalberto Jurado
G.P.O. Box 1512
San Juan, Puerto Rico 00936

Annex

/omh

34040481815

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

1. (a) Name of Committee (in Full) = Check if name or address is changed. 2. Date
AMIGOS DE JIMMY CARTER APRIL 30-1980
(b) Address (Number and Street)
1902 PONCE DE LEON AVE. STOP 26
(c) City, State and ZIP Code
SAN JUAN, PUERTO RICO 00909
3. FEC Identification Number
4. Is this an amended Statement? = YES = NO

4. TYPE OF COMMITTEE (check one):

- (a) This committee is a principal campaign committee. (Complete the candidate information below.)
 (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
JIMMY CARTER DEMOCRATIC PARTY P.R. -
 Name of Candidate Candidate Party Affiliation Office Sought State/District
 (c) This committee supports/opposes only one candidate JIMMY CARTER and is NOT an authorized committee.
 (Name of candidate)
 (d) This committee is a _____ committee of the DEMOCRATIC PARTY Party.
 (National, State or subordinate) (Democratic, Republican, etc.)
 (e) This committee is a separate segregated fund.
 (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

8. Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

 : the registering political committee has identified a "connected organization" above, please indicate type of organization

- = Corporation = Corporation w/o Capital Stock = Labor Organization = Membership Organization = Trade Association = Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records.

Full Name	Mailing Address and ZIP Code	Title or Position
ADALBERTO JURADO	G.P.O. BOX 1512 S. JUAN P.R. 00936	TREASURER

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee, and the name and address of any designated agent (e.g., assistant treasurer).

Full Name	Mailing Address and ZIP Code	Title or Position
ADALBERTO JURADO	G.P.O. Box 1512 SAN JUAN, P.R. 00936	TREASURER

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.	Mailing Address and ZIP Code
BANCO DE SANTANDER SAN JUAN BRANCH ACCOUNT # 001-026329	BANCO DE SANTANDER SAN JUAN, PUERTO RICO 00902 REUNTO SUR #251

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

ADALBERTO JURADO April 30-1980
Treasurer Date

NOTE: Submit all information regarding the informant or the subject of the person signing the statement to the Director of C.I.D.C.

For further information contact

510-0241-1-10

Statement of Organization For a Political Committee

Supporting any candidate(s) for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed Comité Amigos de Jimmy Carter	2 Identification Number
(b) Address (number and street) Ponce de León 1902, 2do. Piso	3 Date February 19, 1980
(c) City, State and ZIP code Santurce, Puerto Rico 00909	4 Is this an amended statement? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" fill in only those lines on which there has been a change

5 Check one

☐ (a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate) a candidate for _____ in the _____ Election (Federal office sought) (Year of election) to be held in the State of _____ (State in which election is held)
(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) This committee is supporting only one candidate and is authorized by _____ (Name of Candidate) to receive contributions and make expenditures with respect to the _____ Election(s) (General, Primary, Runoff, etc) held in _____, and will file all reports and statements with the candidate's principal campaign committee. (Year of election in State) (Full name of principal campaign committee)
(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION) (FEC FORM 2a)

☒ (c) This committee supports only one candidate **Jimmy Carter** but is not an authorized committee (Name of Candidate)

☐ (d) This committee supports more than one Federal candidate and is not a party committee

☐ (e) This committee is a _____ committee of the _____ Party (National, State, county, city) (Democratic, Republican, etc)

6 Names of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
NONE		

If the registering political committee has identified a "connected organization" above, please indicate type of organization

☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative

☐ Corporation without capital stock ☐ Other (please specify)

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).

Statement of Organization For a Committee

(Page 2)

Name of Committee

Comité Amigos de Jimmy Carter

7 Area, Scope and Jurisdiction of Committee:

- (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 seeking State or local office? ☐ Yes ☒ No
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☒ 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
Jimmy Carter	White House Washington, D.C.	President	Democratic Party

(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

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
Adalberto Jurado	G.P.O. Box 1512 San Juan, P.R. 00936	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).

Statement of Organization For Committee

(Page 3)

Name of Committee

Comité Amigos de Jimmy Carter

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee).

Full name	Mailing address and ZIP code	Title or position
Manuel M. Pérez Rodríguez	403 del Parque, Suite 1001 Santurce, P.R. 00912	President
Adalberto Jurado	G.P.O. Box 1512, San Juan, P.R. 00936	Treasurer
Julio Juan García	Ashford 1485, Santurce, Puerto Rico 00907	Vice-President
Antonio Alfonso	Calle Lila Núm. 1687 Urb. San Francisco, Río Piedras, P.R. 00927	Secretary

12 Does this committee plan to stay in existence 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? New Democratic Party of Puerto Rico

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
Banco de Santander de Puerto Rico Account #001-026229	Recinto Sur Núm. 251, San Juan, P.R. 00901

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 Secretary of State pursuant to USC 439(a)).

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

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 of Treasurer)

2/19/80

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441j (see instructions)

For further
information
contact:



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

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee

(Summary Page)

<p>1. Name of Committee (in Full) ADILGAS DE JIMMY CARTER</p> <p>Address (Number and Street) G.P.O. Box 1512</p> <p>City, State and ZIP Code SAN JUAN, P.R. 00936</p> <p><input type="checkbox"/> Check if address is different than previously reported.</p> <p>2. FEC Identification Number</p> <p>3. <input type="checkbox"/> This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)</p>	<p>4. TYPE OF REPORT (check appropriate boxes)</p> <p>(a) <input checked="" type="checkbox"/> April 15 Quarterly Report <input type="checkbox"/> July 15 Quarterly Report <input type="checkbox"/> October 15 Quarterly Report <input type="checkbox"/> January 31 Year End Report <input type="checkbox"/> July 31 Mid Year Report (Non-election Year Only) <input type="checkbox"/> Monthly Report for _____ <input type="checkbox"/> Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____ <input type="checkbox"/> Thirtieth day report following the General Election on _____ in the State of _____ <input type="checkbox"/> Termination Report</p> <p>(b) Is this Report an Amendment? <input type="checkbox"/> YES <input type="checkbox"/> NO</p>
---	--

SUMMARY		Column A This Period	Column B Calendar Year-to-Date
5. Covering Period	<u>MARCH 1</u> Through <u>APRIL 30</u>		
6. (a) Cash on Hand January 1, 19__			\$
6. (b) Cash on Hand at Beginning of Reporting Period		\$ 100.00	
6. (c) Total Receipts (from Line 18)		\$ 72,082.04	\$
6. (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)		\$ 72,182.04	\$
7. Total Disbursements (from Line 28)		\$ 71,839.32	\$
8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))		\$ 352.72	\$ 352.72
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)		\$	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)		\$ 159,099.74	

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

ADALBERTO JURADO
Type or Print Name of Treasurer

[Signature]
SIGNATURE OF TREASURER

4/30/80
Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. § 437g

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

FEC FORM 3X (3-80)

**DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)**

Name of Committee (in Full) AMIGOS DE JIMMY CARTER		Report Covering the Period: From: MARCH 1 To: APRIL 30/80	
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS			
11. CONTRIBUTIONS (other than loans) FROM:			
(a) Individuals/Persons Other Than Political Committees (Name Every Unitemized \$ 72,082.04)			
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)		72,082.04	
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES			
13. ALL LOANS RECEIVED			
14. LOAN REPAYMENTS RECEIVED			
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)			
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17. OTHER RECEIPTS (Dividends, Interest, etc.)			
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)		72,082.04	
II. DISBURSEMENTS			
19. OPERATING EXPENDITURES		218,099.74	
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES			
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
22. INDEPENDENT EXPENDITURES (Use Schedule E)		12,729.32	
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)			
24. LOAN REPAYMENTS MADE			
25. LOANS MADE			
26. REFUNDS OF CONTRIBUTIONS TO			
(a) Individuals/Persons Other Than Political Committees			
(b) Political Party Committees			
(c) Other Political Committees			
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)			
27. OTHER DISBURSEMENTS			
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)			
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11c		72,082.04	
30. TOTAL CONTRIBUTION REFUNDS from Line 26d		72,082.04	
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)			
32. TOTAL OPERATING EXPENDITURES from Line 19		230,829.06	
33. OFFSETS TO OPERATING EXPENDITURES from Line 15		159,099.74	
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)			

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of for
 LINE NUMBER
 (Use separate schedules for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full):

AMIGOS DE JIMMY CARTER

A. Full Name, Mailing Address and ZIP Code COOPERATIVA DE AHORROS Y CREDITO ORIENTAL BOX 321 HUMACAO, P.R. 00661	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	2/26/80	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$	

B. Full Name, Mailing Address and ZIP Code JORGE F. ROMANY APARTADO 4607 SANTUAN, P.R. 00905	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	2/26/80	\$50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$	

C. Full Name, Mailing Address and ZIP Code CENTRO NEURO CARDIOLOGICO SAN RAFAEL 1353 SANTURCE, A.R. 00909	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/28/80	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$	

D. Full Name, Mailing Address and ZIP Code PARTIDO NUEVO PROGRESISTA LARES, P.R.I.C.— BOX 8-237 BEJUCOS	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/28/80	\$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$	

E. Full Name, Mailing Address and ZIP Code CORDERO DEVELOPMENT BOX 8-237 BEJUCOS DORABELA P.R.I.C. 00652	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/28/80	\$50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$	

F. Full Name, Mailing Address and ZIP Code ANGEL L. CANINO E HIJOS CALLE FERRAN #1514 URB. ANTONSANTI RIO PIEDRAS 00927	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	3/28/80	\$300.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$	

G. Full Name, Mailing Address and ZIP Code PEDRO RODRIGUEZ 323 Ing. J. A. RODRIGUEZ ST HATO REY, P.R. 00918	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
	Occupation	2/28/80	\$50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Aggregate Year-to-Date—\$	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

340404918

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of for
LINE NUMBER
(Use separate schedules for each
category of the Detailed
Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

AMIGOS DE JIMMY CARTER

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>ZAIDA RODRIGUEZ RODRIGUEZ 028 URB. TORREMOJONES GUAYNABO, P.R. 00657</p>		<p>Name of Employer</p>	<p>Date (month, day, year)</p> <p>3/28/80</p>	<p>Amount of Each Receipt this Period</p> <p>\$50.00</p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General</p> <p><input type="checkbox"/> Other (specify):</p>		<p>Occupation</p>	<p>Aggregate Year-to-Date—\$</p>	
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>RAY K. & MAULDAK. WOOD GEORGIA, U.S.A.</p>		<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General</p> <p><input type="checkbox"/> Other (specify):</p>		<p>Occupation</p>	<p>Aggregate Year-to-Date—\$</p>	
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>RAMIRO RAMIREZ SAN JUAN, P.R. —</p>		<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General</p> <p><input type="checkbox"/> Other (specify):</p>		<p>Occupation</p>	<p>Aggregate Year-to-Date—\$</p>	
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>SAMANTHA FASHIONS BOX 1271 OLD SAN JUAN 00902</p>		<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$50.00</p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General</p> <p><input type="checkbox"/> Other (specify):</p>		<p>Occupation</p>	<p>Aggregate Year-to-Date—\$</p>	
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>MONSITA MOREYDA DE PAULA BOX 1271 OLD SAN JUAN 00902</p>		<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$50.00</p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General</p> <p><input type="checkbox"/> Other (specify):</p>		<p>Occupation</p>	<p>Aggregate Year-to-Date—\$</p>	
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>MC. JOSE GORTIZ TORO BOX 8845 SANTURCE FOEZ TUNCO S STA. P.R. 00910</p>		<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General</p> <p><input type="checkbox"/> Other (specify):</p>		<p>Occupation</p>	<p>Aggregate Year-to-Date—\$</p>	
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>AMIGOS JUNIOR GRUZ GUAYNABO, P.R. 00657</p>		<p>Name of Employer</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General</p> <p><input type="checkbox"/> Other (specify):</p>		<p>Occupation</p>	<p>Aggregate Year-to-Date—\$</p>	

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

840401821

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ____ of ____ for
LINE NUMBER ____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.			
Name of Committee (in Full) AMIGOS DE JIMMY CARTER			
A. Full Name, Mailing Address and ZIP Code JOE FRANCO & ASSOC. INC. - 1120 ASHFORD AVE. CONDADO/SANTO DOMINGO P.R. 00907	Purpose of Disbursement ADV. RADIO & T.V. - Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year) 3/4/80	Amount of Each Disbursement This Period \$59,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL of Disbursements This Page (optional)			
TOTAL This Period (last page this line number only)			

34040481822

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page ____ of ____ for
LINE NUMBER ____
(Use separate schedules
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
AMIKOS DE JIMMY CARTER				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor JOE FRANCO & ASSOCIATES INC. 1120 ASHFORD AVE CONDADO/SAN JUAN, P.R. 00907				
Nature of Debt (Purpose): ADVERTISMENT {T.V. RADIO}	28,099.74		59,000.00	159,098.74
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

34040481825

October 20, 1981

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

Re.: MUR 1354

Dear Mr. Steele:

I am forwarding the additional information requested by the Commission by letters dated July 6, 1981 and October 9, 1981.

First, I would like to reaffirm myself in the fact that it has always been my purpose to respond adequately and promptly to the Commission's requests. However, I have asked the Commission for additional time in order to file adequate answers, because I was merely a volunteer in Amigos de Jimmy Carter Committee, I have to earn my living by my own and my business takes all my time. I have stated in all my communications, that since "Comité Amigos de Jimmy Carter" closed right after the Presidential Primary of March 16, 1980, it is and it has been very difficult for me to gather the necessary information to respond to your inquiries.

In regard to the particulars of your request for additional information the answers are as follows:

Item 1 - The names are Adalberto Jurado, G.P.O. Box 1512, San Juan, Puerto Rico 00936, and Manuel Pérez Rodríguez, #6 Joffre Street, Laguna Terrace Condominium, Condado, Puerto Rico 00907, Associates was represented by Joe Franco himself, #1120 Ashford Ave., Condado, Puerto Rico 00907.

84040481824

Item 2.- There's was no written contract between the parties. It was only an oral agreement.

Item 3.- Adds were ordered to Mr. Franco and he billed afterwards to the Committee. Credit extended to the Committee had no specific terms. ✓

Item 4.- The development, preparation and production was Joe Franco & Associates's responsibility, and Mr. Jurado and Mr. Pérez Rodríguez the approval. ✓

Item 5.- The only documents available were sent to the Federal Election Commission as part of my letter dated May 15, 1981. ✓

Item 6.- I dont have a list of volunteers and it is not available. There were hundreds of them working for the campaign. Since they were volunteers they didn't have specific duties and they were used for different purposes. All of the campaign was done in the field through the whole island of Puerto Rico. Office work was done at a minimum because we had a small office and a small warehouse for campaign material.

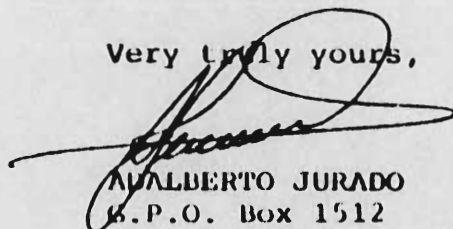
Items 7, 8 and 9.- The \$34,241.37 was raised at a dance celebrated on July 19, 1980 sponsored by Mr. Joe Franco and his staff. The Speaker of the House of Representatives of Puerto Rico was selected as guest Speaker and tickets were sold to the public at \$50.00 per person. ✓

Joe Franco & Associates received the amount of \$34,241.37 from this activity to be credited to the outstanding debt.

84040481825

I hope this information will clear up the whole matter to all effects.

Very truly yours,



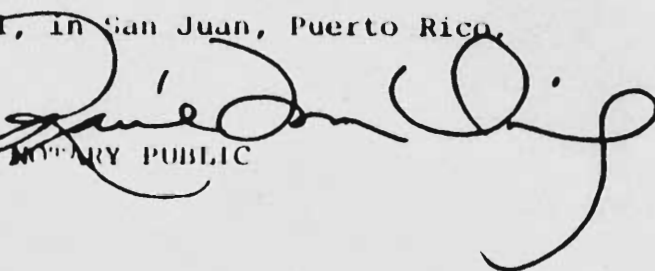
ADALBERTO JURADO
P.O. Box 1512
San Juan, Puerto Rico 00936

AFFIDAVIT NUM. 218

Sworn and subscribed to before me by Mr. Adalberto Jurado,
this 20th day of October, 1981, in San Juan, Puerto Rico.



NOTARY PUBLIC



84040481826

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTERINVOICE NO. **80-3-7 P**DATE: **Marzo 19, 1980** ✓*TV & Radio Spots**Feb. 1980**Radio Network Feb. 23/80**Balance due \$ 409.00***TV****SPOTS DE TELEVISION PROMOCION RADIO MARATON 2/23/80.****WKAN TV (Factura 2225-05)**

Por concepto de 18 cuñas de TV de 30 segundos transmitidas en Best Sellers (2) en feb. 18 y 25 a \$400.00 c/u; Telenoticias 10PM (5) en feb. 18 a 22 a \$325.00 c/u; Telenoticias 6PM (2) en feb. 19 y 21 a \$375.00 c/u; Quest en feb. 19 a \$400.00; Rockford Files en feb. 20 a \$400.00; Hawaii Five-0 en feb. 21 (2) a \$400.00 c/u; Noche de Gala en feb. 21 a \$600.00; Telenoticias 10PM (2) en feb. 23 y (2) en feb. 24 a \$125.00 c/u.

\$ 5,975.00**WAPA TV (Factura 10486)**

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Noticias 11PM (3) en feb. 19 y (2) en feb. 22 a \$300.00 c/u; Police Woman en feb. 19 a \$525.00; Charlie's Angels en feb. 20 a \$620.00; Barnaby Jones en feb. 20 a \$460.00; y Espectacular del Jueves en feb. 21 a \$695.00.

3,200.00**WRRM TV (Factura 80-2-58)**

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en el Once en las Noticias en feb. 19, 20, 21, 22/80 a \$355.00 c/u.

1,420.00**WLUZ TV (Factura 385-60)**

Por concepto de 6 cuñas de TV de 30 segundos transmitidas en Buenas Noches de feb. 19 al 22/80 a \$60.00 c/u.

640.00**Total TV****\$ 11,235.00**

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 17, 1982

SPECIAL DELIVERY

Raul Torres Viera
Mercantil Plaza Building
Suite 1510
Hato Rey, Puerto Rico 00918

RE: MUR 1354

Dear Mr. Viera:

This is in response to your letter of February 9, 1982, in which you request the following:

- (a) an extension of time until the end of February, 1982, in which to file a response in the above-captioned matter;
- (b) copies of "all documents or statements made by any other person which are or have been used" by the Commission during its investigation of the above-captioned matter; and
- (c) the opportunity to refute the allegations before the Commission in the above-captioned matter.

Please be advised that your request for an extension of time to respond has been granted. Your response must be postmarked no later than February 28, 1982. We will not, however, provide you with our investigatory files as they are deemed confidential until such time as the entire file is closed in this matter.

In response to your third question, it is Commission policy to provide respondents the opportunity to respond to any allegations made against them. This matter was internally generated through the normal course of Commission business; no complaint has been filed in this matter. The facts before the Commission as well as the legal basis for its determinations are provided to the respondent during the course of investigative proceedings. Initially, after a finding of reason to believe is made, a notification is provided the respondent. After completion of its investigation, another notification is made to the respondent in the form of a brief of the Office of General Counsel recommending a finding of either probable cause or no probable cause. The respondent then has an opportunity to

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Letter to Raul T. Viera
Page 2

respond with its brief; these submissions are prior to a Commission finding of probable cause or no probable cause to believe a violation has been committed.

You must file a response by February 28, 1982, or the Commission will proceed with its investigation based on the facts now before it.

If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel


BY: Kenneth A. Gross
Associate General Counsel

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82 MAR 5 P2:07

Geo #7289

STATEMENT OF DESIGNATION OF COUNSEL

RE: MUR 1354

NAME OF COUNSEL: Luis Rodríguez Bigas, Esq.

ADDRESS: G.P.O. Box 5072, San Juan, P. R. 00936

TELEPHONE: (809) 725-2222

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

February 10, 1982

Date

Signature

NAME: Joe Franco & Associates, Inc.

ADDRESS: 1120 Ashford Ave.
San Juan, P. R. 00903

HOME PHONE: (809) 725-8445

BUSINESS PHONE: The same

MERCANTIL PLAZA BLDG.
SUITE 1510
HATO REY, PUERTO RICO 00918

Raúl Ferra Viera
ABOGADO - NOTARIO
ATTORNEY AT LAW

104932 RECEIVED
666# 7170
82 FEB 16 P2: 17
P.O. BOX 1103
SAN JUAN, PUERTO RICO 00902
TELE: 753-7430 • 753-7432

February 9, 1982

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

RE: MUR 1354

Dear Mr. Steele:

Reference is made to your letter dated December 14, 1981, in which the Commission determined reason to believe that "Comité Amigos de Jimmy Carter" violated 2USC S 433 and 441(b) in addition to its previous findings that it has violated 2USC S 434.

As instructed, Mr. Jurado filed a statement of designation of Counsel on January 5, 1982, and designated the subscribing attorney as his counsel.

In February 8, 1982, I sustained a telephone conversation with Mrs. Suzanne Callahan, staff member of the Commission, in which I brought up to her the following: First, that I was respectfully going to request an additional extension of time until the end of February 1982, to file an additional statement on behalf of my client with the Commission.

Second, that I consider proper to receive from the Commission all documents or statements made by any other person which are or have been used during the investigation to assert facts of possible violations to 2USC S 431 et seq. Said information is relevant and important for my client to adequately respond to the Commission inquiries and the knowledge of "excerpts" of said documents preclude my client from knowing the complete texts and the possible interpretation or meaning of the same. It is important for my client to know if someone has filed a claim in the matter under review and if so, who is he. That, will enable us to take the steps to complete our own investigation and preparation. The confidential nature of the investigation to the public should not preclude a party to obtain full knowledge of the complete evidence against him.

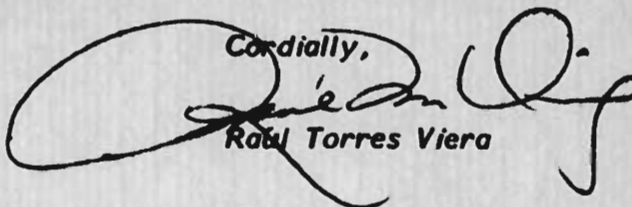
Third, that depending on the information received by the Commission, we would be able to controvert and challenge the incorrect or misconstrued facts that have been assumed as correct by the Commission on its findings and that by the end of February we expect to file such a statement.

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Mr. Charles M. Steele
February 9, 1982
Page -2-

In view of the above mentioned, I would respectfully ask to be granted the extension of time requested and plead the Commission to forward me the information solicited.

Cordially,

A handwritten signature in dark ink, appearing to read 'Raul Torres Viera', with a large, stylized initial 'R'.

Raul Torres Viera

/omh

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6cc# 7034

STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

DOUGLAS B. HURON
EILEEN M. STEIN

(202) 797-3660

MARYLAND OFFICE
7504 BYEBROOK LANE
CHEVY CHASE, MD. 20015
(301) 957-9220

January 25, 1982

The Honorable John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

re: MUR 1354

Dear Mr. Chairman:

I am writing to respond to your letter of December 14, 1981 concerning MUR 1354. We appreciate being granted until January 25 to submit this response.

MUR 1354 arises out of a Commission investigation of Comite Amigos de Jimmy Carter, an independent committee that supported President Carter during the hard fought Puerto Rican primary campaign. As the FEC knows, a similar group was organized to support Senator Kennedy.

The Commission is concerned that Comite Amigos may not have been truly independent of the national Carter/Mondale Presidential Committee, Inc., in which case the money spent by Amigos would be attributed to our campaign. This concern arises because both Carter/Mondale and Amigos used the same advertising agency, Joe Franco & Associates, Inc., and Franco has supposedly made statements questioning Amigos' independence.*

According to the Commission, Franco said that "his advertising company contracted for services totaling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico," and that the "individuals involved in negotiating the contract were" Terry O'Connell, Evan Dobelle, Bob Keefe, Angel Viera Martinez and Adalberto Jurado. The first three gentlemen were

* We say "supposedly" because it is not entirely clear what Franco has charged; part of the problem may be due to difficulties in translation.

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P 4:53
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is not credible for Franco to assert otherwise today, nearly two years later. It seems likely that Mr. Franco's principal interest at the moment lies in collecting money owed his firm by both our Committee and Amigos, and his comments should be viewed in this light.*

Puerto Rico enjoys its own rococo brand of politics. In a significant sense the real battle in March 1980 was not between Carter and Kennedy but rather was between Governor Romero and former Governor Hernandez-Colon, who used the Presidential primary as a testing ground for their electoral confrontation the following November. Romero backed Carter during the primary, and Hernandez-Colon sided with Kennedy.

Given this rich political brew, we cannot say with assurance that none of the Carter/Mondale adherents on the Island ever talked to people from Comite Amigos. We can say, however, that our campaign's spending decisions were not in any way coordinated with those of Amigos. There is no basis for concluding that Comite Amigos was anything other than an independent committee.

Sincerely,



Douglas B. Huron

Attachments

cc: Charles N. Steele, Esq.

* He may believe, for example, that the Amigos debt -- by far the larger of the two -- will be more likely to be paid if it is somehow "assumed" by Carter/Mondale.

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each affiliated with our national campaign organization, while the fourth -- Mr. Viera Martinez -- was the local chair of our Puerto Rican campaign. The fifth individual -- Mr. Jurado -- is said to be the treasurer of Komite Amigos. If the first four men indeed sat down with Jurado and planned how to spend a combined media budget of \$250,000, then serious questions would be raised about Amigos' independence. But this did not happen, and we doubt that Joe Franco believes that it did.

As the Commission concedes, Franco maintained separate accounts for our Committee and for Amigos. We contracted for a total of \$63,624.50 in services from Franco's firm. We have paid him \$39,235 and he has sued us for the balance -- \$24,389.50. All discussions by Carter/Mondale officials with Franco dealt solely with the services covered by the \$63,624.50 -- not with any services being performed for Komite Amigos.

Specifically, Bob Keefe denies all -- and with good reason. He was not in Puerto Rico during the primary campaign, and he does not know either Mr. Jurado or Mr. Franco.

Terry O'Connell and Evan Dobelle were in Puerto Rico on behalf of our Committee, but neither knows Jurado. Both know Joe Franco, but both O'Connell and Dobelle deny ever discussing the spending plans of Komite Amigos with Franco or with anyone else. On the contrary, both men were careful to avoid any contact with Amigos. Our local chair, Mr. Viera Martinez, took the same approach. Indeed, he even sent a letter to the organizers of Komite Amigos on February 19, 1980, informing them that Amigos was not authorized by the Carter/Mondale Presidential Committee, Inc., that Amigos' activities could not in any way be related to those of our campaign, and that our Committee intended to abide by all provisions of Federal election law (see Attachment 1).

Later, on March 8, 1980 Mr. Dobelle sent Joe Franco & Associates a memorandum authorizing purchase of \$25,000 in television spots on behalf of Carter/Mondale. The memo concluded:

This will represent the solely authorized purchase of any media by the official committee to re-elect the President. A letter has been sent last month disavowing any connection of an organization called "Amigos de Jimmy Carter" with us, and I bring this to your attention so you may advise any of our vendors or to answer any press inquiries. [See Attachment 2.]

Dobelle added this paragraph to ensure that Joe Franco understood that there was no tie between our Committee and Amigos. It

CARTER-MONDALE PRESIDENTIAL COMMITTEE, INC. (PUERTO RICO)

Mailing Address: P.O. Box 2483 • San Juan, Puerto Rico 00903 • Phone (801)-753-6115 • 753-6180 • 753-6196 • 753-6199

19 de febrero de 1980

Lic. Manuel Pérez Rodríguez
G.P.O. Box 1512
San Juan, Puerto Rico 00936

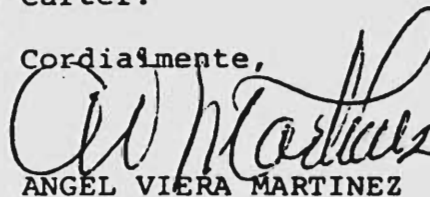
Estimado Lic. Pérez Rodríguez:

Se me ha informado que usted preside el grupo denominado "Comité Amigos de Jimmy Carter" para hacer campaña en Puerto Rico para la reelección del Presidente Jimmy Carter.

La formación de ese "Comité Amigos de Jimmy Carter" no está autorizado por el "Carter-Mondale Presidential Committee, Inc." y sus actividades no pueden estar relacionadas en forma alguna con la campaña del Comité Presidencial Carter-Mondale en Puerto Rico.

La campaña del Presidente Carter en Puerto Rico se rige por la Ley Federal de Elecciones y es necesario que se le de cumplimiento estricto a todas las disposiciones de la Ley Federal de Elecciones con relación a la campaña del Presidente Carter.

Cordialmente,


ANGEL VIERA MARTINEZ

cc: Sr. Alberto Jurado

— ATTACHMENT I —

TO: Joe Franco and Associates, Inc. ^{or} _{subsidiary} _{Phenox}
FROM: Evan S. Dohelle

You are hereby authorized on behalf of the Carter - Mondale Presidential Committee, Inc - S. Lee Kling Treasurer to purchase \$25,000 of television spots on behalf of our National Committee, plus production.

This will represent the solely authorized purchase of any media by the official committee to re-elect the President.

A letter has been sent last month disavowing any connection of an organization called "Amigos de Jimmy Carter" with us, and I bring this to your attention so you may so advise any of our vendors or to answer any press inquiries.

Evan Dohelle
Nat. Finance Com
3/8/80

STEIN & HURON
1619 NEW HAMPSHIRE AVENUE, N. W.
WASHINGTON, D. C. 20009

DOUGLAS B. HURON
EILEEN M. STEIN

(202) 797-3880

MARYLAND OFFICE
7504 BYBROOK LANE
CHEVY CHASE, MD. 20015
(301) 657-9220

January 25, 1982

The Honorable John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

re: MUR 1354

Dear Mr. Chairman:

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The Commission is concerned that Comite Amigos may not have been truly independent of the national Carter/Mondale Presidential Committee, Inc., in which case the money spent by Amigos would be attributed to our campaign. This concern arises because both Carter/Mondale and Amigos used the same advertising agency, Joe Franco & Associates, Inc., and Franco has supposedly made statements questioning Amigos' independence.*

According to the Commission, Franco said that "his advertising company contracted for services totaling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico," and that the "individuals involved in negotiating the contract were" Terry O'Connell, Evan Dobelle, Bob Keefe, Angel Viera Martinez and Adalberto Jurado. The first three gentlemen were

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Dobelle added this paragraph to ensure that Joe Franco understood that there was no tie between our Committee and Amigos. It

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Given this rich political brew, we cannot say with assurance that none of the Carter/Mondale adherents on the Island ever talked to people from Comite Amigos. We can say, however, that our campaign's spending decisions were not in any way coordinated with those of Amigos. There is no basis for concluding that Comite Amigos was anything other than an independent committee.

Sincerely,



Douglas B. Huron

Attachments

cc: Charles N. Steele, Esq.

* He may believe, for example, that the Amigos debt -- by far the larger of the two -- will be more likely to be paid if it is somehow "assumed" by Carter/Mondale.

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CARTER-MONDALE PRESIDENTIAL COMMITTEE, INC. (PUERTO RICO)

Mailing Address: P.O. Box 2483 • San Juan, Puerto Rico 00903 • Phone (801)-753-6115 • 753-6180 • 753-6196 • 753-6199

19 de febrero de 1980

Lic. Manuel Pérez Rodríguez
G.P.O. Box 1512
San Juan, Puerto Rico 00936

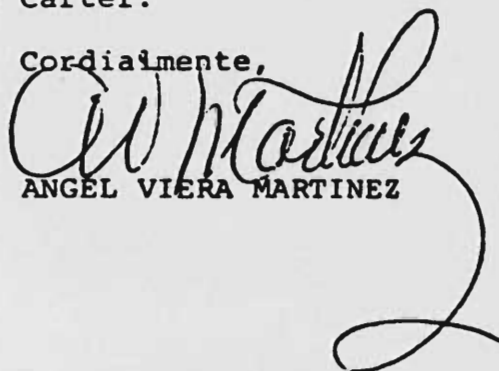
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La campaña del Presidente Carter en Puerto Rico se rige por la Ley Federal de Elecciones y es necesario que se le de cumplimiento estricto a todas las disposiciones de la Ley Federal de Elecciones con relación a la campaña del Presidente Carter.

Cordialmente,


ANGEL VIERA MARTINEZ

cc: Sr. Alberto Jurado

— ATTACHMENT I —

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FROM: Evan S. Daulelle
Phenox

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Evan Daulelle
Nat. Finance Com
3/8/80

600 # 6094

COM

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TARY

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STATEMENT OF DESIGNATION OF COUNSEL

NAME OF COUNSEL: Raúl Torres, Esq.

ADDRESS: Scotia Bank, Bldg., Suite 1610
Ponce de León Ave. #55,
San Juan, Puerto Rico 00919

TELEPHONE: (809) 753-7430

The above-named individual is hereby designated as my
counsel and is authorized to receive any notifications and
other communications from the Commission and to act on my
behalf before the Commission.

January 5, 1982

Date


Signature

NAME: Adalberto Jurado

ADDRESS: G.P.O. Box 1512
San Juan, P. R. 00936

HOME PHONE: 781-3165

BUSINESS PHONE: 781-3165

P.S.: I am requesting by this statement, a 30 days period
extension, so that my counsel can prepare a formal
statement of my position.

I would appreciate your consideration to this request.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

S. Lee Kling, Treasurer
Carter/Mondale Presidential Committee
4710 Bethesda Avenue, Suite 302
Bethesda, Maryland 20014

RE: MUR 1354

Dear Mr. Kling:

On December 14, 1981, the Federal Election Commission determined that there is reason to believe that the Carter/Mondale Presidential Committee violated 2 U.S.C. § 433, § 434, § 441a(b) and § 441b, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

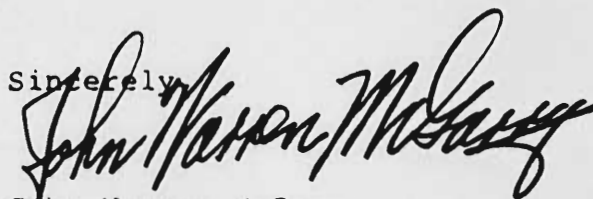
For purposes of the public record, please complete the enclosed form stating the name, address and telephone number of counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Letter to S. Lee Kling
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

34040481845

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Carter/Mondale MUR NO. 1354
Presidential Committee STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

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

SUMMARY OF ALLEGATIONS

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Comite Amigos de Jimmy Carter ("Amigos Committee") violated certain provisions of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

The response to Commission inquiries indicated that the Amigos Committee made independent expenditures of \$218,099.74 advocating the nomination of Jimmy Carter in the presidential primary in Puerto Rico held on March 16, 1980.

According to evidence submitted, all expenditures on behalf of Carter made by the Amigos Committee "were contracted to Joe Franco & Associates, a local advertising agency."

The only report filed by the Amigos Committee lists media expenditures owed to Joe Franco & Associates, Inc., totalling \$218,099.74; the committee had paid Joe Franco \$59,352.72, leaving a balance owed of \$159,099.74.

Additionally, since March 16, 1980, when the Amigos Committee closed operations, a group of Democrats (allegedly not connected with the committee) paid Joe Franco an additional \$34,241.37, reducing the committee's debt to \$124,858.37 as of this writing.

FACTUAL BASIS AND LEGAL ANALYSIS

According to Joe Franco, his advertising company contracted for services totalling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico. The individuals involved in negotiating the contract were as follows:

- Mr. Terry O'Connell - Coordinator for the Campaign in
Puerto Rico, Washington, D.C.
- Mr. Evan S. Dobelle - National Finance Chairman, Carter-
Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005
- Mr. Bob Keefe - National Finance Committee, Carter-
Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005
- Mr. Angel Viera Martinez -
Attorney of Law, coordinator of the
Carter-Mondale local campaign
- Mr. Adalberto Jurado - Treasurer, Comite Amigos de Jimmy
Carter

All above named individuals were officially connected with the Carter-Mondale Committee with the exception of Adalberto Jurado, who was treasurer of Comite Amigos, allegedly an independent committee.

Pursuant to 2 U.S.C. § 431(17), in order for an expenditure to be independent, it must be made

...without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

Information submitted by Joe Franco indicates that Carter-Mondale and Comite Amigos kept separate accounts with his company.

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However, information submitted by Franco indicates that individuals directing the Carter-Mondale Campaign and the ordering of ads by Comite Amigos were one in the same. Based on this close association, the activities of Amigos cannot be considered independent of those of the Carter-Mondale Committee and therefore, are considered authorized. This fact is not reflected on either committee's Statement of Organization in violation of 2 U.S.C. § 433.

8 4 0 4 0 4 8 If the expenditures by Comite Amigos cannot be considered independent within the meaning of the Act, its expenditures must then be considered authorized expenditures by the Carter campaign and, as such, should have been reported accordingly. Both Committees' failure to report their financial activity in accordance with 2 U.S.C. § 434(b) leads to a conclusion that there is reason to believe that the referenced section was violated.

8 4 0 4 0 4 8 Since the time of the last audited computation of August 13, 1980, the Carter Committee was only \$188,000 away from the \$14,710,000 overall expenditure limit. Therefore, if Carter-Mondale expenditures are combined with the \$248,000 expended by Comite Amigos, the limitations of § 441a(b)(1) have been exceeded.

8 Evidence indicates that no written contract between Joe Franco's organization and Comite Amigos exists. However, when Associates was engaged, it was verbally agreed that payments for services would be made in advance. At some point after the initial agreement was made, payments in advance by Comite Amigos eventually ceased. Associates states that no media firm will run advertising without payment in advance. Thus, Associates

paid the media firms for running ads even though they had not yet received advance money from Comite Amigos. Still outstanding at this time is approximately \$25,000 owed on the Carter-Mondale account and \$125,000 owed on the Comite Amigos account.

Joe Franco's response indicates that Associates extended credit to Comite Amigos as an agent of the Carter-Mondale Committee, outside the normal course of business, placing each in violation of 2 U.S.C. § 441b.

Therefore, the General Counsel recommends the Commission find reason to believe the Carter-Mondale Committee violated 2 U.S.C. §§ 433, 434, 441a(b) and 441b.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Jurado:

On December 14, 1981, the Federal Election Commission determined that there is reason to believe that in addition to its previous finding that you violated 2 U.S.C. § 434, you have also violated 2 U.S.C. § 433 and § 441b, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

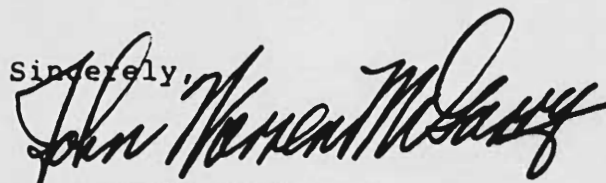
If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Letter to Adalberto Jurado
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,



John Warren McGarry
Chairman

8404048151

8 Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Comite Amigos de
 Jimmy Carter

MUR NO. 1354
STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

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

BACKGROUND

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. § 434(a)(4), § 434(b)(6)(B)(iii), and § 434(b)(8). On that same date, the Commission approved an Order to Answer Questions which was sent to the respondent on March 20, 1981.

Adalberto Jurado, treasurer of the respondent committee, submitted answers to the Commission's Order on May 27, 1981.

The response indicated that the Committee made independent expenditures of \$218,099.74 advocating the nomination of Jimmy Carter in the presidential primary in Puerto Rico held on March 16, 1980.

In his response, Jurado stated that all expenditures on behalf of Carter made by the Committee "were contracted to Joe Franco & Associates, a local advertising agency."

According to the only report filed by the committee, media expenditures owed to Joe Franco & Associates, Inc., totalled \$218,099.74; the committee had paid Joe Franco \$59,352.72, leaving a balance owed of \$159,099.74.

Jurado's recent response to the Commission stated that since March 16, 1980, when the committee closed operations, a group of Democrats (allegedly not connected with the committee) paid Joe Franco an additional \$34,241.37, reducing the committee's debt to \$124,858.37 as of this writing.

FACTUAL BASIS AND LEGAL ANALYSIS

According to an affidavit filed by Joe Franco, his advertising company contracted for services totalling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico. The individuals involved in negotiating the contract were as follows:

- Mr. Terry O'Connell - Coordinator for the Campaign in Puerto Rico, Washington, D.C.
- Mr. Evan S. Dobelle - National Finance Chairman, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005
- Mr. Bob Keefe - National Finance Committee, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005
- Mr. Angel Viera Martinez - Attorney of Law, coordinator of the Carter-Mondale local campaign
- Mr. Adalberto Jurado - Treasurer, Comité Amigos de Jimmy Carter

All above named individuals were officially connected with the Carter-Mondale Committee with the exception of Adalberto Jurado, who was treasurer of Comité Amigos, allegedly an independent committee.

Pursuant to 2 U.S.C. § 431(17), in order for an expenditure to be independent, it must be made

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...without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

The affidavit submitted by Joe Franco indicates that Carter-Mondale and Comite Amigos kept separate accounts with Joe Franco. However, information submitted by Franco indicates that individuals directing the Carter-Mondale Campaign and the ordering of ads by Comite Amigos were one in the same. This close association raises questions as to whether the activities of Amigos can be considered independent of those of the Carter-Mondale Committee.

It is the view of the Office of General Counsel that based on evidence submitted thus far, the Comite Amigos cannot be considered independent of the authorized Carter Campaign and was, in effect, an authorized agent of the Carter-Mondale Committee. This fact is not reflected on either committee's Statement of Organization in violation of 2 U.S.C. § 433.

If the expenditures by Comite Amigos cannot be considered independent within the meaning of the Act, its expenditures must then be considered authorized expenditures by the Carter campaign and, as such, should have been reported accordingly. The Commission has previously found reason to believe that reporting violations have been committed by Comite Amigos.

Joe Franco's affidavit stated that no written contract between his organization and Comite Amigos exists. However, when Associates was engaged, it was verbally agreed that payments

for services would be made in advance. At some point after the initial agreement was made, payments in advance by Comit Amigos eventually ceased. Associates states that no media firm will run advertising without payment in advance. Thus, Associates paid the media firms for running ads even though they had not yet received advance money from Comit Amigos. Outstanding at this time is \$125,000.

Joe Franco's response indicates that Associates extended credit to Comit Amigos outside the normal course of business and Comit Amigos has accepted a corporate contribution.

Therefore, the General Counsel recommends that the Commission find reason to believe that Comit Amigos de Jimmy Carter has violated 2 U.S.C. § 433 and § 441b.

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 14, 1981

Joe Franco
Joe Franco and Associates, Inc.
1120 Ashford Avenue
San Juan, Puerto Rico 00907

RE: MUR 1354

Dear Mr. Franco:

On December 14, 1981, the Federal Election Commission determined that there is reason to believe that you violated 2 U.S.C. § 441b, a provision of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against you, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

If you intend to be represented by counsel in this matter, please advise the Commission by completing the enclosed form stating the name, address and telephone number of such counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Letter to Joe Franco
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,



John Warren McGarry
Chairman

Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Joe Franco and
Associates

MUR NO. 1354
STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

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

BACKGROUND

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Comité Amigos de Jimmy Carter violated certain provisions of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

Adalberto Jurado has indicated that the Committee made independent expenditures of \$218,099.74 advocating the nomination of Jimmy Carter in the presidential primary in Puerto Rico held on March 16, 1980. He stated that all expenditures on behalf of Carter made by the Committee "were contracted to Joe Franco & Associates, a local advertising agency."

According to the only report filed by the committee, media expenditures owed to Joe Franco & Associates, Inc., totalled \$218,099.74; the committee had paid Joe Franco \$59,352.72, leaving a balance owed of \$159,099.74.

Jurado's recent response to the Commission stated that since March 16, 1980, when the committee closed operations, a group of Democrats (allegedly not connected with the committee) paid Joe Franco an additional \$34,241.37, reducing the committee's debt to \$124,858.37 as of this writing.

FACTUAL BASIS AND LEGAL ANALYSIS

According to the affidavit filed by Joe Franco, his advertising company contracted for services totalling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico. The individuals involved in negotiating the contract were as follows:

- Mr. Terry O'Connell - Coordinator for the Campaign in
Puerto Rico, Washington, D.C.
- Mr. Evan S. Dobelle - National Finance Chairman, Carter-
Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005
- Mr. Bob Keefe - National Finance Committee, Carter-
Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005
- Mr. Angel Viera Martinez -
Attorney of Law, coordinator of the
Carter-Mondale local campaign
- Mr. Adalberto Jurado - Treasurer, Comite Amigos de Jimmy
Carter

All above named individuals were officially connected with the Carter-Mondale Committee with the exception of Adalberto Jurado, who was treasurer of Comite Amigos, allegedly an independent committee.

Joe Franco's affidavit stated that no written contract between his organization and Comite Amigos exists. However, when Associates was engaged, it was verbally agreed that payments for services would be made in advance. At some point after the initial agreement was made, payments in advance by Comite Amigos eventually ceased. Associates states that no media firm will run advertising without payment in advance. Thus, Associates

paid the media firms for running ads even though they had not yet received advance money from Comite Amigos and to a lesser degree to the Carter-Mondale Committee. Outstanding at this time is approximately \$125,000 to Comite Amigos and \$25,000 to Carter-Mondale.

Joe Franco's response indicates that Associates extended credit to Comite Amigos and the Carter-Mondale Committee outside the normal course of business.

Therefore, the General Counsel recommends the Commission find reason to believe that Joe Franco and Associates violated 2 U.S.C. § 441b.

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Comite Amigos de)
Jimmy Carter)

MUR 1354

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on December 14, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1354:

1. Find Reason to Believe that the Comite Amigos has violated 2 U.S.C. § 433 and § 441b.
2. Find Reason to Believe that the Carter-Mondale Committee has violated § 433, § 434, § 441a(b) and § 441b.
3. Find Reason to Believe that Joe Franco and Associates has violated 2 U.S.C. § 441b.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

12/14/81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

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

12-9-81, 4:40
12-10-81, 11:00

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS / JODY CUSTER *JC*
DATE: DECEMBER 14, 1981
SUBJECT: COMMENTS REGARDING MUR 1354 - General
Counsel's Report dated 10-20-81

Attached is a copy of Commissioner Aikens'
vote sheet with comments regarding the necessity of
expediting the above-captioned matter.

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ATTACHMENT:
Copy of Vote Sheet

December 9, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1354

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

Attachment

cc: Callahan

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BEFORE THE FEDERAL ELECTION COMMISSION
October 20, 1981

In the Matter of)
) MUR 1354
Comite Amigos de)
Jimmy Carter)

GENERAL COUNSEL'S REPORT

SENSITIVE

Background

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. § 434(a)(4), § 434(b)(6)(B)(iii), and § 434(b)(8). On that same date, the Commission approved an Order to Answer Questions which was sent to the respondent on March 20, 1981.

Adalberto Jurado, treasurer of the respondent committee, submitted answers to the Commission's Order on May 27, 1981.

The response indicated that the Committee made independent expenditures of \$218,099.74 advocating the nomination of Jimmy Carter in the presidential primary in Puerto Rico held on March 16, 1980.

In his response, Jurado stated that all expenditures on behalf of Carter made by the Committee "were contracted to Joe Franco & Associates, a local advertising agency."

According to the only report filed by the committee, media expenditures owed to Joe Franco & Associates, Inc., totalled \$218,099.74; the committee had paid Joe Franco \$59,352.72, leaving a balance owed of \$159,099.74.

Jurado's response of May 27, 1981, stated that since March 16, 1980, when the committee closed operations, a group of Democrats (allegedly not connected with the committee) paid Joe Franco an additional \$34,241.37, reducing the committee's debt to \$124,858.37 as of this writing.

The information submitted by Mr. Jurado indicated that further questions surrounding the extension of credit by Joe Franco to the respondent committee was warranted. Therefore, on July 6, 1981, an order was sent to Joe Franco and Associates and follow-up questions were sent to Mr. Jurado. Mr. Jurado failed to respond to those questions. Therefore, on October 9, 1981, an Order was issued to the respondent; he responded to the Order on November 3, 1981. Jurado's response of November 3rd did not provide any information which differs from that previously submitted and for that reason is not addressed in the text of this report.

Evidence/Analysis

According to the affidavit filed by Joe Franco, his advertising company contracted for services totalling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico. The individuals involved in negotiating the contract were as follows:

Mr. Terry O'Connell - Coordinator for the Campaign in
Puerto Rico, Washington, D.C.

Mr. Evan S. Dobelle - National Finance Chairman, Carter-
Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005

Mr. Bob Keefe - National Finance Committee, Carter-
Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005

Mr. Angel Viera Martinez -

Attorney of Law, coordinator of the
Carter-Mondale local campaign

Mr. Adalberto Jurado - Treasurer, Comite Amigos de Jimmy
Carter

All above named individuals were officially connected with
the Carter-Mondale Committee with the exception of Adalberto
Jurado, who was treasurer of Comite Amigos, allegedly an
independent committee.

Pursuant to 2 U.S.C. § 431(17), in order for an expenditure
to be independent, it must be made

...without cooperation or consultation with
any candidate, or any authorized committee or
agent of such candidate, and which is not
made in concert with, or at the request or
suggestion of, any candidate, or any
authorized committee or agent of such
candidate.

The affidavit submitted by Joe Franco indicates that Carter-
Mondale and Comite Amigos kept separate accounts with Joe Franco.
However, information submitted by Franco indicates that individuals
directing the Carter-Mondale Campaign as well as the ordering of ads
by Comite Amigos were one in the same. This close association
raises questions as to whether the activities of Amigos can be
considered independent of those of the Carter-Mondale Committee,
a fact which is not reflected on either committee's Statement of
Organization in possible violation of 2 U.S.C. § 433.

It is the view of the Office of General Counsel that based
on evidence submitted thus far, sufficient questions have been
raised requiring an investigation of the Carter Campaign.

Thus, we feel it is appropriate at this time to send a
reason to believe notification to the Carter Committee and afford

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them the opportunity to respond to the facts as stated. Subsequent to receipt and analysis of a response, this Office will be in a position to determine whether further investigation is warranted.

If the expenditures by Comite Amigos are not in fact independent of the Carter committee, within the meaning of the Act, its expenditures must then be considered authorized expenditures by the Carter campaign and, as such, should have been reported accordingly. Both Committees' failure to report their financial activity in accordance with 2 U.S.C. § 434(b) leads to a conclusion that there is reason to believe that that section was violated.

One year has lapsed since the last derivation of Carter-Mondale expenditure figures by the Audit Division. However, at the time of the last audited computation on August 13, 1980, the Carter-Mondale Committee was \$188,000 away from the \$14,710,000 overall expenditure limit. This figure takes into account estimated winding down costs as well as debts and obligations. Based on the assumption that Carter-Mondale expenditures are combined with the \$248,000 expended by Comite Amigos, the limitations of § 441a(b)(1) have apparently been exceeded.

During the course of our investigation, copies of written advertisements will be requested from Comite Amigos to ascertain whether 2 U.S.C. § 441d violations have been committed in addition to those addressed in this report.

Joe Franco's affidavit stated that no written contract between his organization and Comite Amigos exists. However, he

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states that when Associates was engaged, it was verbally agreed that payments for services would be made in advance. However, Franco informed us that at some point after the initial agreement was made, payments in advance by Comite Amigos eventually ceased. Associates states that no media firm will run advertising without payment in advance; thus, Associates paid the media firms for running ads even though they had not yet received advance money from Comite Amigos and the Carter-Mondale Committee. Outstanding at this time is approximately \$125,000 owed by Comite Amigos and \$25,000 by Carter-Mondale.

Joe Franco's response indicates that Associates extended credit of \$125,000 to Comite Amigos (an agent of the Carter-Mondale Committee) and \$25,000 to the principal Committee.

Based on the statements made by Joe Franco, further inquiry should be made as to whether his handling of these transactions, which did not comply with normal advance payment requirements, were in the ordinary course of the handling of such delinquent accounts. Thus, we recommend that reason to believe a 2 U.S.C. § 441b violation be found.

Recommendations

It is recommended that the Commission find reason to believe that:

1. The Comite Amigos has violated 2 U.S.C. § 433, and § 441b;
2. The Carter-Mondale Committee has violated § 433, § 434, § 441a(b), and § 441b;
3. Joe Franco and Associates has violated 2 U.S.C. § 441b.

Charles N. Steele
General Counsel

Dec. 9, 1981
Date

BY:

Kenneth A. Gross
Kenneth A. Gross
Associate General Counsel

Attachments

Reason to Believe Notifications (3)
Notification Letters (3)
(17 total pages attached)

84040431862

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Comite Amigos de
 Jimmy Carter

MUR NO. 1354
STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

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

BACKGROUND

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. § 434(a)(4), § 434(b)(6)(B)(iii), and § 434(b)(8). On that same date, the Commission approved an Order to Answer Questions which was sent to the respondent on March 20, 1981.

Adalberto Jurado, treasurer of the respondent committee, submitted answers to the Commission's Order on May 27, 1981.

The response indicated that the Committee made independent expenditures of \$218,099.74 advocating the nomination of Jimmy Carter in the presidential primary in Puerto Rico held on March 16, 1980.

In his response, Jurado stated that all expenditures on behalf of Carter made by the Committee "were contracted to Joe Franco & Associates, a local advertising agency."

According to the only report filed by the committee, media expenditures owed to Joe Franco & Associates, Inc., totalled \$218,099.74; the committee had paid Joe Franco \$59,352.72, leaving a balance owed of \$159,099.74.

Jurado's recent response to the Commission stated that since March 16, 1980, when the committee closed operations, a group of Democrats (allegedly not connected with the committee) paid Joe Franco an additional \$34,241.37, reducing the committee's debt to \$124,858.37 as of this writing.

FACTUAL BASIS AND LEGAL ANALYSIS

According to an affidavit filed by Joe Franco, his advertising company contracted for services totalling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico. The individuals involved in negotiating the contract were as follows:

- 84040481871
- Mr. Terry O'Connell - Coordinator for the Campaign in --
Puerto Rico, Washington, D.C.
 - Mr. Evan S. Dobelle - National Finance Chairman, Carter-Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005
 - Mr. Bob Keefe - National Finance Committee, Carter-Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005
 - Mr. Angel Viera Martinez -
Attorney of Law, coordinator of the
Carter-Mondale local campaign
 - Mr. Adalberto Jurado - Treasurer, Comite Amigos de Jimmy
Carter

All above named individuals were officially connected with the Carter-Mondale Committee with the exception of Adalberto Jurado, who was treasurer of Comite Amigos, allegedly an independent committee.

Pursuant to 2 U.S.C. § 431(17), in order for an expenditure to be independent, it must be made

...without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

The affidavit submitted by Joe Franco indicates that Carter-Mondale and Comite Amigos kept separate accounts with Joe Franco. However, information submitted by Franco indicates that individuals directing the Carter-Mondale Campaign and the ordering of ads by Comite Amigos were one in the same. This close association raises questions as to whether the activities of Amigos can be considered independent of those of the Carter-Mondale Committee.

It is the view of the Office of General Counsel that based on evidence submitted thus far, the Comite Amigos cannot be considered independent of the authorized Carter Campaign and was, in effect, an authorized agent of the Carter-Mondale Committee. This fact is not reflected on either committee's Statement of Organization in violation of 2 U.S.C. § 433.

If the expenditures by Comite Amigos cannot be considered independent within the meaning of the Act, its expenditures must then be considered authorized expenditures by the Carter campaign and, as such, should have been reported accordingly. The Commission has previously found reason to believe that reporting violations have been committed by Comite Amigos.

Joe Franco's affidavit stated that no written contract between his organization and Comite Amigos exists. However, when Associates was engaged, it was verbally agreed that payments

for services would be made in advance. At some point after the initial agreement was made, payments in advance by Comit  Amigos eventually ceased. Associates states that no media firm will run advertising without payment in advance. Thus, Associates paid the media firms for running ads even though they had not yet received advance money from Comit  Amigos. Outstanding at this time is \$125,000.

Joe Franco's response indicates that Associates extended credit to Comit  Amigos outside the normal course of business and Comit  Amigos has accepted a corporate contribution.

Therefore, the General Counsel recommends that the Commission find reason to believe that Comit  Amigos de Jimmy Carter has violated 2 U.S.C.   433 and   441b.

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Joe Franco and
Associates

MUR NO. 1354
STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

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

BACKGROUND

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Komite Amigos de Jimmy Carter violated certain provisions of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

Adalberto Jurado has indicated that the Committee made -- independent expenditures of \$218,099.74 advocating the nomination of Jimmy Carter in the presidential primary in Puerto Rico held on March 16, 1980. He stated that all expenditures on behalf of Carter made by the Committee "were contracted to Joe Franco & Associates, a local advertising agency."

According to the only report filed by the committee, media expenditures owed to Joe Franco & Associates, Inc., totalled \$218,099.74; the committee had paid Joe Franco \$59,352.72, leaving a balance owed of \$159,099.74.

Jurado's recent response to the Commission stated that since March 16, 1980, when the committee closed operations, a group of Democrats (allegedly not connected with the committee) paid Joe Franco an additional \$34,241.37, reducing the committee's debt to \$124,858.37 as of this writing.

FACTUAL BASIS AND LEGAL ANALYSIS

According to the affidavit filed by Joe Franco, his advertising company contracted for services totalling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico. The individuals involved in negotiating the contract were as follows:

Mr. Terry O'Connell - Coordinator for the Campaign in Puerto Rico, Washington, D.C.

Mr. Evan S. Dobelle - National Finance Chairman, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005

Mr. Bob Keefe - National Finance Committee, Carter-Mondale Presidential Committee, 1413 K Street, N.W., Washington, D.C. 20005

Mr. Angel Viera Martinez - Attorney of Law, coordinator of the Carter-Mondale local campaign

Mr. Adalberto Jurado - Treasurer, Comite Amigos de Jimmy Carter

All above named individuals were officially connected with the Carter-Mondale Committee with the exception of Adalberto Jurado, who was treasurer of Comite Amigos, allegedly an independent committee.

Joe Franco's affidavit stated that no written contract between his organization and Comite Amigos exists. However, when Associates was engaged, it was verbally agreed that payments for services would be made in advance. At some point after the initial agreement was made, payments in advance by Comite Amigos eventually ceased. Associates states that no media firm will run advertising without payment in advance. Thus, Associates

paid the media firms for running ads even though they had not yet received advance money from Comit  Amigos and to a lesser degree to the Carter-Mondale Committee. Outstanding at this time is approximately \$125,000 to Comit  Amigos and \$25,000 to Carter-Mondale.

Joe Franco's response indicates that Associates extended credit to Comit  Amigos and the Carter-Mondale Committee outside the normal course of business.

Therefore, the General Counsel recommends the Commission find reason to believe that Joe Franco and Associates violated 2 U.S.C.   441b.

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

RESPONDENT Carter/Mondale
Presidential Committee

MUR NO. 1354
STAFF MEMBER(S) & TEL. NO.
Suzanne Callahan
(202) 523-4057

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

SUMMARY OF ALLEGATIONS

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Comite Amigos de Jimmy Carter ("Amigos Committee") violated certain provisions of the Federal Election Campaign Act of 1971, as amended, and instituted an investigation of this matter.

The response to Commission inquiries indicated that the Amigos Committee made independent expenditures of \$218,099.74 advocating the nomination of Jimmy Carter in the presidential primary in Puerto Rico held on March 16, 1980.

According to evidence submitted, all expenditures on behalf of Carter made by the Amigos Committee "were contracted to Joe Franco & Associates, a local advertising agency."

The only report filed by the Amigos Committee lists media expenditures owed to Joe Franco & Associates, Inc., totalling \$218,099.74; the committee had paid Joe Franco \$59,352.72, leaving a balance owed of \$159,099.74.

Additionally, since March 16, 1980, when the Amigos Committee closed operations, a group of Democrats (allegedly not connected with the committee) paid Joe Franco an additional \$34,241.37, reducing the committee's debt to \$124,858.37 as of this writing.

FACTUAL BASIS AND LEGAL ANALYSIS

According to Joe Franco, his advertising company contracted for services totalling \$249,634.04 in connection with the presidential primary campaign in Puerto Rico. The individuals involved in negotiating the contract were as follows:

Mr. Terry O'Connell - Coordinator for the Campaign in
Puerto Rico, Washington, D.C.

Mr. Evan S. Dobelle - National Finance Chairman, Carter-
Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005

Mr. Bob Keefe - National Finance Committee, Carter-
Mondale Presidential Committee,
1413 K Street, N.W., Washington,
D.C. 20005

Mr. Angel Viera Martinez -
Attorney of Law, coordinator of the
Carter-Mondale local campaign

Mr. Adalberto Jurado - Treasurer, Comite Amigos de Jimmy
Carter

All above named individuals were officially connected with the Carter-Mondale Committee with the exception of Adalberto Jurado, who was treasurer of Comite Amigos, allegedly an independent committee.

Pursuant to 2 U.S.C. § 431(17), in order for an expenditure to be independent, it must be made

...without cooperation or consultation with any candidate, or any authorized committee or agent of such candidate, and which is not made in concert with, or at the request or suggestion of, any candidate, or any authorized committee or agent of such candidate.

Information submitted by Joe Franco indicates that Carter-Mondale and Comite Amigos kept separate accounts with his company.

However, information submitted by Franco indicates that individuals directing the Carter-Mondale Campaign and the ordering of ads by Comite Amigos were one in the same. Based on this close association, the activities of Amigos cannot be considered independent of those of the Carter-Mondale Committee and therefore, are considered authorized. This fact is not reflected on either committee's Statement of Organization in violation of 2 U.S.C. § 433.

8 4 0 4 0 4 1 8 7 2
If the expenditures by Comite Amigos cannot be considered independent within the meaning of the Act, its expenditures must then be considered authorized expenditures by the Carter campaign and, as such, should have been reported accordingly. Both Committees' failure to report their financial activity in accordance with 2 U.S.C. § 434(b) leads to a conclusion that there is reason to believe that the referenced section was violated.

8 4 0 4 0 4 1 8 7 2
Since the time of the last audited computation of August 13, 1980, the Carter Committee was only \$188,000 away from the \$14,710,000 overall expenditure limit. Therefore, if Carter-Mondale expenditures are combined with the \$248,000 expended by Comite Amigos, the limitations of § 441a(b)(1) have been exceeded.

8 4 0 4 0 4 1 8 7 2
Evidence indicates that no written contract between Joe Franco's organization and Comite Amigos exists. However, when Associates was engaged, it was verbally agreed that payments for services would be made in advance. At some point after the initial agreement was made, payments in advance by Comite Amigos eventually ceased. Associates states that no media firm will run advertising without payment in advance. Thus, Associates

10

paid the media firms for running ads even though they had not yet received advance money from Comitè Amigos. Still outstanding at this time is approximately \$25,000 owed on the Carter-Mondale account and \$125,000 owed on the Comitè Amigos account.

Joe Franco's response indicates that Associates extended credit to Comitè Amigos as an agent of the Carter-Mondale Committee, outside the normal course of business, placing each in violation of 2 U.S.C. § 441b.

Therefore, the General Counsel recommends the Commission find reason to believe the Carter-Mondale Committee violated 2 U.S.C. §§ 433, 434, 441a(b) and 441b.

84040431830



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

S. Lee Kling, Treasurer
Carter/Mondale Presidential Committee
4710 Bethesda Avenue, Suite 302
Bethesda, Maryland 20014

RE: MUR 1354

Dear Mr. Kling:

On , 1981, the Federal Election Commission determined that there is reason to believe that the Carter/Mondale Presidential Committee violated 2 U.S.C. § 433, § 434, § 441a(b) and § 441b, provisions of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter.

In the absence of any additional information which demonstrates that no further action should be taken against the committee, the Commission may find probable cause to believe that a violation has occurred and proceed with conciliation. Of course, this does not preclude the settlement of this matter through conciliation prior to a finding of probable cause to believe if you so desire. See 11 C.F.R. § 111.18(d).

For purposes of the public record, please complete the enclosed form stating the name, address and telephone number of counsel, and a statement authorizing such counsel to receive any notifications and other communications from the Commission.

Letter to S. Lee Kling
Page 2

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne Callahan, the staff member assigned to this matter, at (202) 523-4057.

Sincerely,

John Warren McGarry
Chairman

84040481832
Enclosures

General Counsel's Factual and Legal Analysis
Procedures
Designation of Counsel Statement

13

101949



western union

Telegram

WJA174(1613)(1-023994C2 93)PD 10/20/81 1612

OCT 20 PM 8:10

Gcc 5675

OCT 21 AM 1:13

OCT 21 AM 9:56

ICS IPMWGWF WSH

02461 10-20 0511P EDT

ICS IPMWJ08

I-167123G293 10/20/81

ICS IPMIIHA IISS

IISS F M ITT 20 1611

PMS WASHINGTON DC

AWR056 VIA ITT PJA282 PCA2930029

UIWA CO PDSJ 042

SANJUANPR 042/040 20 1608 CMR

FEDERAL ELECTION COMMISSION

1325 K ST NW

WASHINGTONDC 20463

ATT: MR CHARLES N. STEELE

GENERAL COUNSELOR

REFMUR1354 I AM PENDING MY ANSWER TO YOUR INQUIRIES

W.U. 1201-SF (R5-89)



western union

Telegram

AS OF OCTOBER 9 1981 BY CERTIFIED MAIL WITH RETURN
RECEIPT.

ADALBERTO JURADO

TREASURER FORMAL COMMITTEE AMIGOS DE JIMMY CARTER

COL 20463 REFMUR1354

1611 EST

NNNN

100038

RECEIVED

600# 5753

October 20, 1981

01 NOV 4 P 2: 21

01 NOV 3 P 2: 54

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

Re.: MUR 1354

Dear Mr. Steele:

I am forwarding the additional information requested by the Commission by letters dated July 6, 1981 and October 9, 1981.

First, I would like to reaffirm myself in the fact that it has always been my purpose to respond adequately and promptly to the Commission's requests. However, I have asked the Commission for additional time in order to file adequate answers, because I was merely a volunteer in Amigos de Jimmy Carter Committee, I have to earn my living by my own and my business takes all my time. I have stated in all my communications, that since "Comité Amigos de Jimmy Carter" closed right after the Presidential Primary of March 16, 1980, it is and it has been very difficult for me to gather the necessary information to respond to your inquiries.

In regard to the particulars of your request for additional information the answers are as follows:

Item 1 - The names are Adalberto Jurado, G.P.O. Box 1512, San Juan, Puerto Rico 00936, and Manuel Pérez Rodríguez, #6 Joffre Street, Laguna Terrace Condominium, Condado, Puerto Rico 00907, Associates was represented by Joe Franco himself, #1120 Ashford Ave., Condado, Puerto Rico 00907.

84040481831

Item 2.- There's was no written contract between the parties. It was only an oral agreement.

Item 3.- Adds were ordered to Mr. Franco and he billed afterwards to the Committee. Credit extended to the Committee had no specific terms.

Item 4.- The development, preparation and production was Joe Franco & Associates's responsibility, and Mr. Jurado and Mr. Pérez Rodríguez the approval.

Item 5.- The only documents available were sent to the Federal Election Commission as part of my letter dated May 15, 1981.

Item 6.- I dont have a list of volunteers and it is not available. There were hundreds of them working for the campaign. Since they were volunteers they did'nt have specific duties and they were used for different purposes. All of the campaign was done in the field through the whole island of Puerto Rico. Office work was done at a minimum because we had a small office and a small warehouse for campaign material.

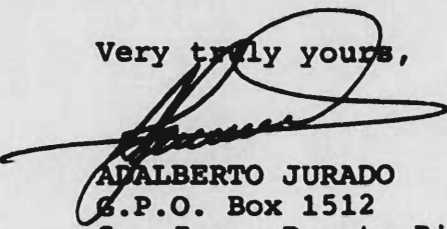
Items 7, 8 and 9.- The \$34,241.37 was raised at a dance celebrated on July 19, 1980 sponsored by Mr. Joe Franco and his staff. The Speaker of the House of Representatives of Puerto Rico was selected as guest Speaker and tickets were sold to the public at \$50.00 per person.

Joe Franco & Associates received the amount of \$34,241.37 from this activity to be credited to the outstanding debt.

84040431835

I hope this information will clear up the whole matter to all effects.

Very truly yours,


ADALBERTO JURADO
G.P.O. Box 1512
San Juan, Puerto Rico 00936

AFFIDAVIT NUM. *218*

Sworn and suscribed to before me by Mr. Adalberto Jurado,
this 20th day of October, 1981, in San Juan, Puerto Rico.




NOTARY PUBLIC

34040481836

MUR 1354

18 October 1981

Memo To File:

Order issued to Adalberto Jurado and mailed October 9, 1981, has been re-mailed this date certified mail, return receipt requested.

Suzanne Callahan

<p align="center">Collection Form 1394</p> <p align="center">Section 1: Return to Sender</p> <p align="center">All items returned to the sender must be marked with this symbol.</p>								
<p>1. The following article is returned (check one):</p> <p><input checked="" type="checkbox"/> Return to sender and date delivered......</p> <p><input type="checkbox"/> Return to sender, date and address of delivery......</p> <p><input type="checkbox"/> UNDELIVERED DELIVERY</p> <p>Return to sender and date delivered......</p> <p><input type="checkbox"/> RECEIVED DELIVERY.</p> <p>Return to sender, date, and address of delivery......</p>								
<p align="center">SECTION 2: POSTMASTER PER FEE</p>								
<p>2. ARTICLES RETURNED TO:</p> <p align="center">Adalberto Jurado GPO Box 1512 San Juan, Puerto Rico 00931</p>								
<p>3. ARTICLES DESCRIPTION:</p> <table border="1"> <tr> <td>REGISTERED NO.</td> <td>CERTIFIED NO.</td> <td>INSURED NO.</td> </tr> <tr> <td align="center" colspan="3">943324</td> </tr> </table> <p><i>(Indicate whether signature of addressee or agent)</i></p> <p>I have marked the article returned above.</p> <p>Signature: <i>(Signature)</i> Printed name: _____</p>			REGISTERED NO.	CERTIFIED NO.	INSURED NO.	943324		
REGISTERED NO.	CERTIFIED NO.	INSURED NO.						
943324								
<p>4. Date of delivery:</p> <p align="center">OCT 26 1981</p>								
<p>5. Address (Complete only if required):</p> <p>_____</p>								
<p>6. Unable to deliver because:</p> <p>_____</p>								

334740431337



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 9, 1981

Mr. Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Jurado:

This is in reference to your letter of September 8, 1981, in which you request an extension of "no less than thirty additional days to respond" to the Commission's questions dated July 6, 1981.

Based on your failure to respond to the Commission's questions two months beyond the stated deadline, the Commission has issued the enclosed order which compels you to file a written response to the enclosed questions within a specified time period. Your response must be postmarked no later than five days after your receipt of this notification.

Failure to respond to this order may result in the filing of a Civil Action in United States District Court.

Should you have any questions, direct them to Suzanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: 
Kenneth A. Gross
Associate General Counsel

Enclosure

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3

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Comite Amigos de) MUR 1354
Jimmy Carter)

ORDER TO SUBMIT WRITTEN ANSWERS

To: Adalberto Jurado
Treasurer
GPO Box 1512
San Juan, Puerto Rico 00936

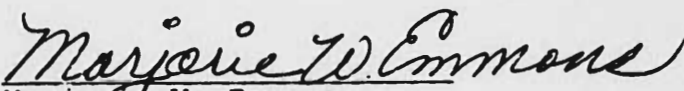
Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within five (5) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this 7th day of October, 1981.


John Warren McGarry

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions (one page)

QUESTIONS: Adalberto Orado

1. State the name and address of each person who was involved in any way in negotiating the contract between Joe Franco and The Committee Amigos de Jimmy Carter (hereinafter "the Committee"). (Include the names of individuals representing Joe Franco.)
 2. Explain, in detail, the terms of the contract between Joe Franco and the Committee; in lieu thereof, a verified copy of the contract may be submitted. Submit all documents in any way relating to the contract agreement between Joe Franco and the Committee.
 3. Explain in detail the financial arrangements between Joe Franco and the Committee. Include in your response what type of credit was extended to the Committee by Joe Franco and whether any funds were required by Joe Franco prior to production of the advertisements.
 4. Name all individuals involved in the development, preparation, and approval of all media production designed for the Committee on behalf of Jimmy Carter. (In your response, include the address, occupation, principal place of business and phone number of all named individuals).
 5. Submit legible copies of all correspondence, memoranda and other documents relating to your transactions with Joe Franco in connection with his billings to the Committee as well as invoices which show the money owed by your Committee to Joe Franco. (Include all written documents from all parties including, if applicable, collection agencies).
 6. Provide a list of volunteers who worked for the Committee including name, address and phone number and duties with the Committee.
- 8 4 0 4 0 4 8 1 8 9 0
- In response to the Commission's Order of March 20, 1981, you state ". . . a group of Democrats on their individual capacities, and without connection with the Committee, have paid Mr. Franco an additional amount of \$34,241.37 to be credited to the outstanding debt and which stands as of this letter at \$124,858.37."
7. In regard to the above statement, provide a detailed, itemized list of each individual involved with the subject payments totalling \$34,241.37 including, but not limited to, the name, address, phone number, amount paid and date of payment.
 8. How were the individuals, named in your response to Question #7, solicited and/or made aware of the outstanding debt owed Joe Franco by the Committee?
 9. Describe the circumstances of how and when you became aware of the \$34,241.37 payment by a "group of Democrats" to Joe Franco.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
DATE: OCTOBER 7, 1981
SUBJECT: SUBPOENA RE: MUR 1354

The attached subpoena, which was Commission approved on October 6, 1981 by a vote of 4-0, has been signed and sealed this date.

Attachment

84040481891

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Commite Amigos de Jimmy Carter)

MUR 1354

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on October 6, 1981, the Commission approved by a vote of 4-0 the Order for Adalberto Jurado, as submitted with the General Counsel's October 1, 1981 memorandum.

Commissioners Aikens, Reiche, Thomson and Tiernan voted affirmatively in this matter; Commissioners Harris and McGarry did not cast a vote.

Attest:

10/6/81

Date

Marjorie W. Emmons

Marjorie W. Emmons
Secretary of the Commission

Received in Office of the Commission Secretary: 10-1-81, 4:09
Circulated on 48 hour vote basis: 10-2-81, 2:00

October 1, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1354

Please have the attached Memo to the Commission
distributed to the Commission on a 48 hour tally basis.
Thank you.

Attachment

cc: Callahan

34040481893

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

81 OCT 1 P4:09

October 1, 1981

MEMORANDUM

TO : The Commission

FROM : Charles N. Steele
General Counsel

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

SUBJECT: Authorization to Issue an Order - MUR 1354

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Comite Amigos de Jimmy Carter violated 2 U.S.C. § 434(a)(4), § 434(b)(6)(iii), and § 434(b)(6). On that same date, the Commission approved an Order to Answer Questions which was sent to the respondent on March 20, 1981.

Adalberto Jurado, treasurer of the respondent Committee, submitted answers to the Commission's Order on May 27, 1981. After review of Jurado's response, it was determined that additional questions should be sent to the respondent. The Commission approved OGC's recommended follow-up questions which were mailed to the respondent on July 6, 1981.

On September 8, 1981, the respondent submitted a letter requesting an extension of time of at least thirty days in which to respond. Several telephone calls have been placed to the respondent by OGC staff but have not been returned.

Based on the respondent's past failure to cooperate and in order to expedite this investigation, it is recommended that the Commission approve and send the attached questions under order to Adalberto Jurado.

Recommendation

Approve attached Order for Adalberto Jurado.

Attachments

Notification letter
Order
One page of questions
(3 total pages)

34040481894



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

Mr. Aaalberto Jurado
GPO box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Jurado:

This is in reference to your letter of September 8, 1981, in which you request an extension of "no less than thirty additional days to respond" to the Commission's questions dated July 6, 1981.

Based on your failure to respond to the Commission's questions two months beyond the stated deadline, the Commission has issued the enclosed order which compels you to file a written response to the enclosed questions within a specified time period. Your response must be postmarked no later than five days after your receipt of this notification.

Failure to respond to this order may result in the filing of a Civil Action in United States District Court.

Should you have any questions, direct them to Suzanne Callahan, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

BY: Kenneth A. Gross
Associate General Counsel

Enclosure

84040481895

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
)
Comite Amigos de) MUR 1354
Jimmy Carter)

ORDER TO SUBMIT WRITTEN ANSWERS

To: Adalberto Jurado
Treasurer
GPO Box 1512
San Juan, Puerto Rico 00936

Pursuant to 2 U.S.C. § 437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within five (5) days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this day of , 1981.

John Warren McGarry

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment
Questions (one page)

QUESTIONS

Adalberto Jurado

1. State the name and address of each person who was involved in any way in negotiating the contract between Joe Franco and the committee. (Include the names of individuals representing Joe Franco.)
2. Explain, in detail, the terms of the contract between Joe Franco and the Committee; in lieu thereof, a verified copy of the contract may be submitted. Submit all documents in any way relating to the contract agreement between Joe Franco and the Committee.
3. Explain in detail the financial arrangements between Joe Franco and the Committee. Include in your response what type of credit was extended to the committee by Joe Franco and whether any funds were required by Joe Franco prior to production of the advertisements.
4. Name all individuals involved in the development, preparation, and approval of all media production designed for the committee on behalf of Jimmy Carter. (In your response, include the address, occupation, principal place of business and phone number of all named individuals.)
5. Submit legible copies of all correspondence, memoranda and other documents relating to your transactions with Joe Franco in connection with his billings to the Committee as well as invoices which show the money owed by your committee to Joe Franco. (Include all written documents from all parties including, if applicable, collection agencies.)
6. Provide a list of volunteers who worked for the committee including name, address and phone number and duties with the committee.

In response to the Commission's Order of March 20, 1981, you state ". . . a group of Democrats on their individual capacities, and without connection with the committee, have paid Mr. Franco an additional amount of \$34,241.37 dollars to be credited to the outstanding debt and which stands as of this letter at \$124,858.37."
7. In regard to the above statement, provide a detailed, itemized list of each individual involved with the subject payments totalling \$34,241.37 including but not limited to the name, address, phone number, amount paid and date of payment.
8. How were the individuals, named in your response to Question #7, solicited and/or made aware of the outstanding debt owed Joe Franco by the Comité Amigos de Jimmy Carter (hereinafter "the Committee")?
9. Describe the circumstances of how and when you became aware of the \$34,241.37 payment by a "group of Democrats" to Joe Franco.

RECEIVED

101550 Gcc# 5416

31 SEP 8 P2:44

Mr. Kenneth A. Gross
Associate General Council
Federal Election Commission
Washington, D.C. 20463

RE: MUR 1354

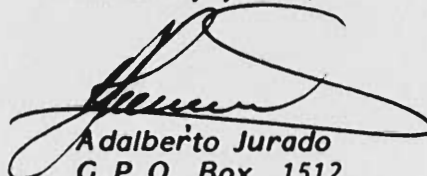
Dear Mr. Gross:

I acknowledge receipt of your letter requesting additional information on the matter of reference, dated July 6, 1981 and received by me on August 4, 1981.

As I have stated in previous letters since "Comité Amigos de Jimmy Carter" closed operations and ceased to exist since March 16, 1980, I need time to gather all the information and documents requested.

Therefore, I request an extension of time of no less than 30 additional days to respond adequately to your inquiries.

Cordially yours,



Adalberto Jurado
G.P.O. Box 1512
San Juan, Puerto Rico 00936

CERTIFIED MAIL

34040481828

31 SEP 8 P3:29

GENERAL COUNCIL

222

Get# 5173

JOE FRANCO & ASSOCIATES, Inc.

Advertising

Public Relations

JUL 24 1981

49:40

Mr. Charles N. Steele
General Counsel
FEDERAL ELECTION COMMISSION
Washington, D.C. 20463

Dear Mr. Steele:

RE: MUR - 1354

Following is the information you requested concerning our participation in the advertising campaign on behalf of the candidacy of former President Jimmy Carter.

1. No. The committee contracted services totalling \$249, 634.04. Associates was contracted to carry on an advertising campaign in Puerto Rico for the Puerto Rico Democratic Presidential Primary. Our services included the production of press, television and radio advertising and printing material, placing spots in media and advising and planning usually rendered by an advertising agency. We are enclosing herewith copies of all invoices billed to the Committee. (Exhibit 1)

2. The persons involved in the negotiation to contract our services for the Carter-Mondale Presidential Committee were:

Mr. Terry O'Connell - Coordinator for the Campaign in Puerto Rico
Washington, D.C.

Mr. Evan S. Dobelle - National Finance Chairman, Carter-Mondale Presidential Committee
1413 K Street, N.W., Washington, D.C. 20005

Mr. Bob Keefe - National Finance Committee, Carter Mondale Presidential Committee
1413 K Street N.W. Washington, D.C. 20005

Mr. Angel Viera Martínez -
Attorney of Law, coordinator of the Carter-Mondale local campaign.

Mr. Adalberto Jurado - Treasurer Comité Amigos de Jimmy Carter.

84040481899

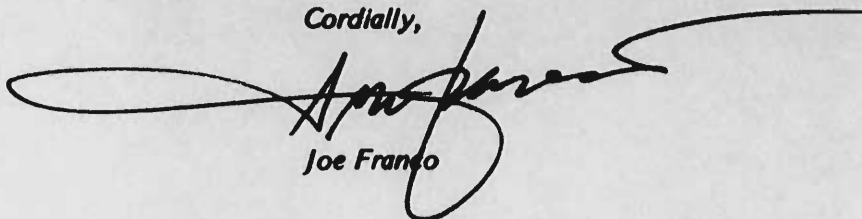
84040481900

3. *There is no written contract. It was agreed with the Committee that all services to be performed by Associates were to be paid in advance.*
4. *When Associates were engaged, all payments were made in advance. Subsequently, Committee started to pay after the expense was incurred and finally Associates incurred the expenses but was not paid.*
5. *All political advertising placed in media in Puerto Rico has to be paid in advance. Nobody gives credit for political advertising. We have to pay in advance all media contracted, as normal procedure we request payment in advance from our political clients.*
6. *Yes. All text and production was prepared by employees of Associates.*
7. *No written contracts were prepared. Associates contracted with the different media, that is, newspapers, radio and television stations, etc. and Associates paid the media billing the Committee.*
8. *Thanks to the extended credit and to the advertising campaign developed by our Agency Jimmy Carter won the primaries in Puerto Rico. Right after the primaries were over we initiated our efforts to collect money owed us but all money raised by them were directed towards helping finance the other primaries in the other States of the Union. We talked and wrote them about the money owed.*
9. *No.*
10. *At this moment the Comité Amigos de Jimmy Carter faction owe us \$124, 858.37 and the Carter-Mondale Committee owe us \$24, 389.50. They kept separate accounts but the people directing the campaign and ordering the placing of the ads were the same. See Exhibit 2 and 3 about the Carter-Mondale Committee Account.*
11. *The Committee billed with us a total of \$249, 6234.04 out of which \$124, 775.67 were paid as detailed in Exhibit 4. Payment was received from Comité Amigos de Jimmy Carter.*
12. *Payments were made by checks as the campaign was moving on and we were requesting payments in advance. We were in daily contact with them discussing advertising strategy and delivering all they requested.*
13. *Payments were solely made by the Committee. Even money raising activities were organized after the primary, with our support in order to pay debts contracted.*

14. We are enclosing a detailed statement of account which shows payments and another exhibit with information about payments. Also copies of ALL invoices for services rendered by us. Those invoices which were paid show PAID in red. Exhibit 3

If any other information is requested please let us know.


Cordially,


Joe Franco

Affidavit No. 7054

Sworn & subscribed before me by Joe Franco, of legal age, married, President of Joe Franco & Associates and resident of San Juan, Puerto Rico, to me personally known in San Juan, Puerto Rico on July 29, 1981




Luis Rodriguez Bigas
Notary Public

84040481901

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO., 79-12-2 P

COMITE AMIGOS DE JIMMY CARTER

DATE: 12/12/79

Exhibit 1

ENDOSAMOS Y RESPALDAMOS LA REELECCION DEL
PRESIDENTE JIMMY CARTER

EL NUEVO DIA (Factura 120222)

Por concepto de 1 anuncio de 65 pulgadas
publicado en diciembre 5, 1980.

\$ 1,105.00

TENPO CREATIVE SERVICES (Factura 79-12-1)

Por concepto de arte final, negativo, tipografia
para anuncio de prensa publicado en El Nuevo Dia.

142.50

TOTAL

\$ 1,247.50

IRMA H. GOMEZ

PAID

005

\$20,000

3-4-80

JOE FRANCO & ASSOCIATES, INC.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-2-16 P

COMITE AMIGOS DE JIMMY CARTER
GPO BOX 1512
SAN JUAN, P.R. 00936

DATE: Feb. 25, 1980

IMPRESOS

CHARLIE SANCHEZ-QUALITY DISPLAYS

Por la impresión de 20 cruzacalles
a \$50.00 c/u.

\$ 1,000.00 ✓

RAMALLO BROS. (Facturas 10913-10942)

Por la impresión de 30,000 posters
12 1/2 x 20 en 3 col. y 30,000 posters
16 1/4 x 25 en 3 col.

7,728.00 ✓

TEMPO CREATIVE SERVICES, INC. (Fact. 80-2-2)

Por la impresión de 4,000 labels para latas
de recolectas.

156.00

ENVELOPES INC. (Factura 8625)

Por la impresión de:

200,000 sobres 6 3/4 para recolecta 2/9/80
200,000 sobres 6 3/4 para recolecta 2/23/80.

3,900.00 ✓

TAINO INC.

Por la impresión de 11,694.00 banderas.

5,471.24 ✓

TEMPO CREATIVE SERVICES, INC. (Fact. 80-2-8)

Por la impresión de 10,000 fotos de Jimmy
Carter.

310.00

TEMPO CREATIVE SERVICES, INC. (Factura 80-2-25)

Por la impresión de 20,000 posters - Radio
Maratón 2/23 y 2/9/1980.

1,800.00

Total Impresos

\$ 20,365.24

POSTERS GUAGUAS

SAN JUAN BUS ADV. (Factura 9133)

Por la exhibición de 100 posters en los lados

PAID

OK NO. 002/019/Varios
2/27 - 3/31 - 5/31

JOE FRANCO & ASSOCIATES, INC.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-2-16 P

DATE:

- 2 -

de 100 guaguas de la AHA por 1 mes
en feb. 17 a marzo 16/80.

\$ 7,100.00 ✓

EUS POSTERS PROD.

Por la impresión de 100 posters para
exhibición en las guaguas de la AHA.

4,000.00

Total Posters \$ 11,100.00

PRODUCCION

TEMPO SOUND STUDIOS (Factura 80-2-28)
Por jingle "Soy Demócrata" incluyendo
2 cantantes, solistas, coros, orquesta
de 14 músicos, 5 arreglos y grabación
en estudio y copias.

4,250.00 ✓

TELEVICENTRO SOUND (Factura 3541)
Por grabación en video tape de spot
"Promoción de Radio Maratón"-Feb. 23/80.
Incluye filmación, edición del mensaje.

2,400.00 ✓

TEMPO SOUND STUDIOS (Fact. 80-2-65)
Por grabación de sound truck para mensaje
TV Radio Maratón; 2 cuñas de radio pro-
moviendo radio maratón a transmitirse del
18 al 23 de feb./80.

310.00 ✓

TEMPO SOUND STUDIOS (Factura 80-2-131)
Por 125 sound truck tapes 8 track en
mensajes promoción Campaña Carter-marzo
16/80. Incluye grabación de pauta con
locutores.

1,350.00 ✓

TEMPO SOUND STUDIOS (Fact. 80-2-116)
Por la grabación de cuñas de Radio pro-
moviendo el Radio Maratón de feb. 23/80.
Incluye 12 cartridges para emisoras.

280.00 ✓

84040481904

JOE FRANCO & ASSOCIATES, INC.

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INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-2-16 P

DATE:

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TEMPO CREATIVE SERVICES INC. (Fact. 80-2-53)
Por diseño y arte final para los siguientes
trabajos:

- 1- Banderas Carter Carter
- 2- Bumper stickers
- 3- Cruzacalles
- 4- Poster, Radio Maratón
- 5- Poster Re-elice al Presidente
- 6- Labels para alcancías
- 7- Sobre para Radio Maratón
- 8- Anuncio de prensa

\$ 635.00 ✓

Total Prod. \$ 9,285.00

TOTAL \$ 40,750.24

IVA W. GOMEZ

34040481903

JOE FRANCO & ASSOCIATES, INC.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE: Marzo 19, 1980

TV

SPOTS DE TELEVISION: PROMOCION RADIO MARATON 2/23/80.

WKAQ TV (Factura 2225-05)

Por concepto de 18 cuñas de TV de 30 segundos transmitidas en Rest Sellers (2) en feb. 12 y 25 a \$400.00 c/u; Telenoticias 10PM (5) en feb. 12 al 22 a \$325.00 c/u; Telenoticias 6PM (2) en feb. 19 y 21 a \$375.00 c/u; Quest en feb. 19 a \$400.00; Rockford Files en feb. 20 a \$400.00; Hawaii Five-0 en feb. 21 (2) a \$400.00 c/u; Noche de Gala en feb. 21 a \$600.00; Telenoticias 10PM (2) en feb. 23 y (2) en feb. 24 a \$125.00 c/u.

\$ 5,975.00

WAPA TV (Factura 10480)

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Noticias 11PM (3) en feb. 19 y (2) en feb. 22 a \$300.00 c/u; Police Woman en feb. 19 a \$525.00; Charlie's Angels en feb. 20 a \$620.00; Barnaby Jones en feb. 20 a \$460.00; y Espectacular del Jueves en feb. 21 a \$695.00.

3,200.00

WASH TV (Factura 80-2-58)

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en el Once en las Noticias en feb. 10, 20, 21, 22/80 a \$355.00 c/u.

1,420.00

WLUZ TV (Factura 335-60)

Por concepto de 6 cuñas de TV de 30 segundos transmitidas en Buenas Noches de feb. 10 al 22/80 a \$100.00 c/u.

640.00

Total TV

\$ 11,235.00

PAID

14673-4879

6/29 10/16

JOE FRANCO & ASSOCIATES, Inc.

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INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE:

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Prensa

PROMOCION RADIO MARATON 2/23/80

EL NUEVO DIA (Factura 021094)

Por concepto de 1 anuncio de 40
pulgadas publicado en feb. 22 y 23,
1980. (Gran Radio Maratón)

\$ 1,360.00

TEMPO CREATIVE SERVICES (Factura 80-2-203)

Por concepto de arte final, negativo y
fotostáticas para 1 anuncio de prensa de
40 pulgadas.

290.00

Total Prensa

\$ 1,650.00

RADIO

PROMOCION RADIO MARATON 2/23/80

WKAJ RADIO (Factura 2322-03)

Por concepto de transmisión de 35
cuñas de Radio de 30 segundos en
Radio Reloj A1 en feb. 18 al 22/80
a \$61.00 c/u.

2,135.00

CADENA ULTIMA HORA-MUNO (Factura 40)

Por concepto transmisión de 15 cuñas de
30 segundos en Noticiero Ultimo Hora en
feb. 18 al 22 a \$36.00 c/u.

540.00

WKAJ RADIO (Factura 80-84)

Por concepto transmisión de 15 cuñas de
30 segundos en Show de Alfred de feb.
18 al 22/80 a \$24.00 c/u.

360.00

34040907

JOE FRANCO & ASSOCIATES, INC.

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INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

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WJAC RADIO (Factura 39722)

Por concepto transmisión de 15 cuñas de 30 segundos de feb. 18 a 22/80 a \$18.00 c/u. \$ 270.00

WAPA RADIO (Factura 0144)

Por concepto transmisión de 15 cuñas de 30 segundos de feb. 18 al 22/80 a \$16.00 c/u. 240.00

WJEL RADIO (Factura 1230)

Por concepto transmisión de 30 cuñas de 30 segundos en feb. 21 al 22/80. 180.00

WPR1-FM (Factura 0955)

Por concepto transmisión de 10 cuñas de 30 segundos de feb. 21 al 22/80. 180.00

Total Radio 2/23/80 \$ 3,905.00

PROMOCION RADIO MARATON 3/1/80

WKAQ RADIO (Factura 2471-03)

Por concepto transmisión de 20 cuñas de 30 segundos en Radio Pelot AI en feb. 28 y 29/80 a \$61.00 c/u. 1,220.00

CADENA ULTIMA HORA (Factura 60)

Por concepto transmisión de 30 cuñas de 30 segundos en Noticiero Ultima Hora (WUHO) en feb. 28 y 29/80 a \$36.00 c/u. 360.00

Total Radio 3/1/80 1,580.00

Total Promoción Radio \$ 5,485.00

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COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

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CADENA RADIO MARATON 2/23/80 POR LAS SIGUIENTES ESTACIONES

WUMQ RADIO-RIO PIEDRAS (Fact. 73) 8 horas (incluye remoto)	\$ 2,800.00
WCTI-ARECIBO (Fact. 41684)	960.00
WRIA-AGUADILLA (Fact. 26-F)	800.00
WZAR-PONCE (Fact. 02-0060)	2,200.00
WLEO-PONCE (Fact. 02-0078)	1,620.00
WREL-MAYAGUEZ (Fact. 22470) 4 1/2 horas.	720.00
WIRA-MAYAGUEZ (Fact. 6224)	640.00
WALO-INEMACAO (Fact. 2-00-338)	700.00
WEGA-VEGA BAJA (Fact. 4762)	800.00
WVUP-CAGUAS (Fact. 31-511)	600.00
WERA-SAN SEBASTIAN (Fact. 80-2-25) 4 1/2 horas.	460.00
WSOL-LUQUILLO (Fact. 1045)	1,200.00
WYRF-CHAYAMA (Fact. F-74)	1,200.00
WUPR-ITUADO (Fact. 2-136-80)	1,280.00

Total Cadena 2/23/80

\$ 10,040.00

TOTAL

\$ 24,410.00

PAID BY

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-8 P

COMITE AMIGOS DE JIMMY CARTER

DATE: Marzo 20, 1980

PRODUCCION

TELEVICENTRO FILMS

Por concepto spot de TV, copias (3)
en video tape de 2 segundos de joven,
chica y grupo cantando en avenida "Soy
Demócrata".

\$ 3,150.00

MUSIC SOUND

Por concepto producción de jingle "Es
con Jimmy Carter" incluyendo músicos,
cantantes, licencia, arreglos musicales,
grabación en estudio y derechos de uso
para radio y TV.

2,950.00

TV

TELEVICENTRO FILMS

Por concepto de producción spot de TV de
30 segundos "Es con Jimmy Carter" incluyendo
talento, filmación, edición, locutor, grabación
en sonido y copias en VTR. (Chica cantando en
comité)

3,010.00

RADIO

SPOTS DE RADIO DE 30 SEGUNDOS SOBRE PRIMARIAS JIMMY CARTER

Por grabación en estudio de cuñas de 30
segundos, mixing, copias en tapes y en
cartridges para estaciones de radio inclu-
yendo spots "Primarias Demócratas" "Segunda
Fase Radio Maratón", spot con jingle "Soy
Demócrata" y "Caravana".

1,545.00

84040481910

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-8 P

DATE:

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Grabación de spot en inglés para uso
en estación WHOA.

\$ 270.00

Por pauta y 257 sound track tapes
(8-track) entregados a miembros del
Partido y al Comité (Jingle "Es con
Jimmy Carter")

2,640.00

HECTOR TPAYIESO

Por servicios como locutor en cuñas de
radio de 30 segundos campaña de Jimmy
Carter.

1,000.00

SPOT DE RADIO "A LA DERROTA"

Grabación de spot de 30 segundos con
27 cartridges edición y tapes.

530.00

RAUL ROSADO

Por concepto de locución en spot a 2
voces "A la derrota" y en Chappaquidick.

200.00

TAINO, INC.

Por concepto de producción adicional de
10,500 banderas Carter/Carter adicionales.

4,830.00

TV

WAPA TV

Por concepto de 3 cuñas de 30 segundos
transmitidas en Break 7:58 en marzo 7,
10,12, 1980 a \$370.00 c/u.

1,110.00

WKDH-TV CANAL 11

Por concepto de 6 cuñas de 30 segundos
transmitidas en Novela 9P: en marzo 7
al 14, 1980 a \$350.00 c/u.

2,100.00

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INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-8 P

DATE:

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WKBM-TV CANAL 11

Por concepto de 3 cuñas de TV de 30 segundos en Break 8:01 en marzo 10, 12, 13, 14, 1980 a \$325.00 c/u.

\$ 1,300.00

SPOT DE RADIO SOBRE CHAPPAQUIDICK

Por grabación, edición y cartridges para pasar el 3 de marzo de 1980.

190.00

TOTAL

\$ 24,825.00

84040481912

IRMA M. GOMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-9 P

DATE: Marzo 19, 1980

TRANSMISION RADIO MARATONES

MARATON MARZO 1/80

WALO-HUMACAO

Por concepto transmisión de 3 horas del
Radio Maratón en marzo 1/80.

\$ 300.00

WOMI-ARECIBO

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 1/80.

420.00

WAEI-MAYAGUEZ

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 2/80.

315.00

WVJP-CAGUAS

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 1/80.

275.00

WZAR-PONCE

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 1/80.

975.00

WLEO-PONCE

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 1/80.

525.00

WUNO-RIO PIEDRAS

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 1/80.

1,225.00

Total Radio 3/1/80 \$ 4,035.00

MARATON MARZO 8/80

WUNO-RIO PIEDRAS

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 8/80.

1,225.00

PAID

EX. NO. 001

3-4-80

Date

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-9 P

DATE:

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WALO-HUMACAO

Por concepto transmisión de 3 horas
del Radio Maratón en marzo 8/80.

\$ 300.00

WCH-ARECIBO

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 8/80.

420.00

WVJP-CAGUAS

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 8/80.

275.00

WZAR-PONCE

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 8/80.

975.00

WLEO-PONCE

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 8/80.

525.00

WATL-MAYAGUEZ

Por concepto transmisión de 3 1/2 horas
del Radio Maratón en marzo 8/80.

315.00

Total Radio 3/8/80 \$ 4,035.00

TOTAL RADIO MARATHONES \$ 8,070.00

TRANSMISION PROGRAMA RADIAL DIARIO
DE 1/2 HORA (6:00 a 6:30 PM) DE FEB.
19 A MARZO 14/80 POR LAS SIGUIENTES
RADIOEMISORAS

WUNO-RIO PIEDRAS

Por concepto transmisión de 19 programas
de 1/2 hora de feb. 19 a marzo 14/80 a
\$175.00 c/u.

3,325.00

84040481914

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1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-9 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

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WDD-FAJARDO

Por concepto transmisión de 10 programas de
1/2 hora de feb. 19 a marzo 3/80 a \$95.00 c/u. \$ 950.00

WMA-AGUADILLA

Por concepto transmisión de 9 programas de
1/2 hora en feb. 20 a marzo 3/80 a \$60.00 c/u. 540.00

WLEO-PONCE

Por concepto transmisión de 10 programas de
1/2 hora de feb. 19 a marzo 3/80 a \$80.00 c/u. 800.00

WZAR -PONCE

Por concepto transmisión de 10 programas de
1/2 hora de feb. 19 a marzo 3/80 a \$150.00 c/u. 1,500.00

Total Radio \$ 7,115.00

JOSE A. RODRIGUEZ/TECNICO

Por servicios como técnico de remoto en
10 programas.

950.00

Total Técnico 950.00

Total Programa R. 8,065.00

PRENSA

ANUNCIO SOBRE CADENA RADIAL

EL NUEVO DIA

Por concepto de 1 anuncio de 24 pulgadas
publicado en feb. 26, 28/80. (Cadena Radial) 816.00

34040481915

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-9 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

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TEMPO CREATIVE SERVICES

Por concepto de arte final, negativo y
fotostáticas para anuncio de prensa.

\$ 100.00

NATIONAL TYPESETTING SERVICES

Por concepto de tipografía para anuncio
de prensa.

25.00

Total Prensa

\$ 941.00

TOTAL

\$17,076.00

34040481916

IRMA H. GOMEZ

JOE FRANCO & ASSOCIATES, INC.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-10 P

COHITE AMIGOS DE JIMMY CARTER

DATE: Marzo 19, 1980

CAMPAÑA DE TV PROMOCION PRIMARIAS DEMOCRATAS

WAPA TV

Por concepto de 6 cuñas de TV de 30 segundos transmitidas en Don Cholito 12:45PM en marzo 5,6,7,12,13,14/80 a \$155.00 c/u.

\$ 930.00

WAPA TV

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Station Break 6:29 en marzo 4,5,7,10,11,12,14/80 a \$320.00 c/u.

2,240.00

WAPA TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Station Break 6:58 en marzo 7,8,14,15/80 a \$370.00 c/u.

1,480.00

WAPA TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Station Break 7:58 en marzo 6,8,9,13,15/80 a \$370.00 c/u.

1,850.00

WAPA TV

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Station Break 8:58 en marzo 5,12 a \$415.00 c/u y marzo 6,8,9,13,15/80 a \$385.00 c/u.

2,755.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Police Woman en marzo 4, 1980 a \$420.00.

420.00

WAPA TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Noticentro 6:00PM en marzo 11,13/80 a \$450.00 c/u.

1,800.00

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INVOICE TO:

INVOICE NO. 80-3-10 P

COMITE ANIGOS DE JIMMY CARTER

DATE:

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WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Fantasy Island en marzo 9, 1980 a \$620.00.

\$ 620.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Charlie's Angels en marzo 5, 12/80 a \$620.00 c/u.

1,240.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en UFO en marzo 12/80 a \$590.00.

590.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Barnaby Jones en marzo 5, 12 (2)/80 a \$390.00 c/u.

1,170.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Ay Bendito Que Pueblito en marzo 9/80 a \$475.00 c/u.

950.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Salvaje en marzo 13/80 a \$555.00.

555.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Eight is Enough en marzo 14/80 a \$500.00.

500.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitida en Rich Man.

JOE FRANCO & ASSOCIATES, INC.

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INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-10 P

DATE:

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Poor Man en marzo 7,14(2)/80 a \$370.00 c/u. \$ 1,110.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Gran Espectacular en marzo 6,13/80 a \$475.00 c/u.

950.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en El Hombre Nuclear en marzo 7,14(2)/80 a \$420.00 c/u.

1,260.00

WAPA TV

Por concepto de 12 cuñas de TV de 30 segundos transmitidas en Noticentro 11PM en marzo 4,5,6,7,8,11,12,13(2),14,15(2)/80 a \$300.00 c/u.

3,600.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Disneylandia en marzo 15/80 a \$375.00.

375.00

Total WAPA TV \$ 24,395.00

WKAO TV

Por concepto de 14 cuñas de TV de 30 segundos transmitidas en Telenoticias 10PM en marzo 4(2),5,6,7(2),10(2),11(2),12,13,14(2)/80 a \$325.00 c/u.

4,550.00

WKAO TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Telenoticias 6PM en marzo 4,5,11,12/80 a \$375.00 c/u.

1,500.00

WKAO TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Novela 7PM en marzo 14/80 a \$825.00.

825.00

34040481912

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INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-10 P

DATE:

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WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Lo Mejor de Hollywood en marzo 8,15(2)/80 a \$300.00 c/u. \$ 900.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Show de Mydia en marzo 9/80 a \$450.00. 450.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Retorno del Santo en marzo 9/80 a \$400.00. 400.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Little House en marzo 9/80 a \$350.00. 350.00

WKAQ TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Best Sellers en marzo 10/80 a \$450.00 c/u. 900.00

WKAQ TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Quest en marzo 4(2) y 11(2) a \$400.00 c/u. 1,600.00

WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Gran Película en marzo 7,14(2)/80 a \$450.00 c/u. 1,350.00

WKAQ TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Rockford Files en marzo 5(2),12(3)/80 a \$400.00 c/u. 2,000.00

34040481920

JOE FRANCO & ASSOCIATES, Inc.

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INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO: 80-3-10 P

DATE:

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WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Salsa Sábado en la Noche en marzo 8,15(2) a \$400.00 c/u. \$ 1,200.00

WKAQ TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Chapulín en marzo 6,13/80 a \$675.00 c/u. 1,350.00

WKAQ TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Hawaii 5-0 en marzo 6(2)/80 y marzo 13(3)/80 a \$400.00 c/u. 2,000.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Gente Joven en marzo 15/80. 375.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Muppet Show en marzo 15/80. 200.00

Total WKAQ TV \$ 19,950.00

WLIJZ TV

Por concepto de 24 cuñas de TV de 30 segundos transmitidas en Buenas Noches en marzo 4 al 14/80 a \$80.00 c/u. 1,920.00

WKBN TV

Por concepto de 12 cuñas de TV de 30 segundos transmitidas en Noticias 10PM en marzo 4-7 y 10-14/80 a \$250.00 c/u. 3,000.00

TOTAL TV \$ 49,265.00

34040481921

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-10 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 6 -

IMPRESOS

TEMPO CREATIVE SERVICES (Fact. 80-3-64,56,14)

Por concepto de impresión y arte de 70,000 posters a dos colores de Jimmy Carter (Vota por el número 1) 11x17.

\$ 3,200.00

RAMALLO BROS (Fact. 10993)

Por concepto de impresión de 20,000 posters 12 1/2 x 20 "Carter" y 20,000 posters 16x25 "Carter".

4,568.00

TEMPO CREATIVE SERVICES (Fact. 80-2-204 y 80-3-63)

Por concepto impresión de 32,500 fotos de Jimmy Carter con su firma.

1,007.50

TEMPO CREATIVE SERVICES (Fact. 80-3-4)

Por concepto impresión y arte de 55,000 posters 11x17 "Dale tu voto el 16 de marzo".

2,300.00

TEMPO CREATIVE SERVICES (Fact. 80-3-45)

Por concepto impresión de hojas sueltas con fotos del Hon. Angel Viera Martínez y grupo.

750.00

TEMPO CREATIVE SERVICES (Fact. 80-2-125)

Por concepto de impresión y arte de papel carta y 10,000 sobres de Comité Amigos de Jimmy Carter.

155.00

TEMPO CREATIVE SERVICES (Fact. 80-2-202)

Por concepto de arte para bumper stickers y arte de caricatura.

100.00

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-10 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 7 -

TEMPO CREATIVE SERVICES (Fact. 80-3-67)

Por concepto de impresión de 50,000 tickets a dos colores "Respalda al Presidente Carter a usted le corresponde votar".

\$ 1,200.00

TEMPO CREATIVE SERVICES (Fact. 80-2-199)

Por concepto de impresión de posters para Campaña Promoción Radio Maratón 2/23/80.

1,700.00

TEMPO CREATIVE SERVICES (Fact. 80-3-70)

Por concepto de impresión de 20,000 tarjetas "Maratón Bailable"; 60,000 tarjetas "donativo" 1.00 y 200 tarjetas de identificación.

1,350.00

MULTI PLASTICS (Fact. 2797 y 2828)

Por concepto de 25,000 bumper stickers "Re-elige a Carter".

3,700.00

TAIHO COLOR LAB. (Fact. 80/23 y 30)

Por concepto de 8,955 banderas "Carter, Carter" a .46¢.

4,119.30

MULTI PLASTICS (Fact. 2845)

Por concepto de 5,000 bumper stickers "Nadie se ahoga".

600.00

MULTI PLASTICS (Fact. 2854)

Por concepto de 4,000 calcomanías "Pres. de Colegio" y 4,000 "Jimmy Carter".

864.00

Total Impresos \$ 25,613.80

TOTAL \$ 74,870.80

YRMA H. GOMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-11 P

DATE: Marzo 20, 1980

RADIO

PROMOCION CARAVANA 3-8-80

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj am en marzo
6,7/80 a \$61.00 c/u y 15 locales en marzo
8/80 a \$18.00 c/u.

\$ 880.00

PROMOCION PRIMARIAS DEMOCRATAS

WKAQ RADIO

Por concepto de 25 cuñas de 30 segundos
transmitidas en Radio Reloj am de marzo
10 al 14/80 a \$61.00 c/u.

1,525.00

CAMPANA JIMMY CARTER PRIMARIAS

WIAC RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas en Noti Reloj de marzo 12
al 14/80 a \$18.00 c/u.

324.00

WUNO RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas en Noticiero Ultima Hora en
marzo 12 al 14/80 a \$36.00 c/u.

648.00

WOBS RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas localmente de marzo 12 al
15/80 a \$24.00 c/u.

480.00

WPPP RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 14/80 a \$7.00 c/u.

420.00

WAEI RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 15/80 a \$5.00 c/u.

300.00

JOE FRANCO & ASSOCIATES, INC.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-11 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 2 -

WCMN RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 15/80 a \$4.00 c/u. \$ 240.00

WHEL-CAGUAS

Por concepto de 60 cuñas de 30 segundos
transmitidas de marzo 12 al 15/80 a \$6.00 c/u. 360.00

WFOA-SAN JUAN

Por concepto de 52 cuñas de 30 segundos
transmitidas de marzo 10 al 15/80 a
\$9.00 c/u. 468.00

WKVH RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas de marzo 12 al 14/80 a
\$24.00 c/u. 432.00

WKAQ RADIO

Por concepto de 90 cuñas de 30 segundos
transmitidas en marzo 14/80 en Radio Reloj
a \$61.00 c/u. 5,490.00

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo
15/80 a \$61.00 c/u. 610.00

WKAQ RADIO

Por concepto de 4 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo
16/80 a \$61.00 c/u. 244.00

TRANSMISION DE SPOT "A LA DERROTA"

JOE FRANCO & ASSOCIATES, INC.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-11 P

DATE:

- 3 -

WBOZ-SAN GERMAN

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$3.50 c/u. \$ 105.00

WHIA RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$1.70 c/u. 51.00

WKFE-YAUCO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$4.50 c/u. 135.00

WABA-AGUADILLA

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$3.50 c/u. 105.00

WKJV-MAYAGUEZ

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$4.00 c/u. 120.00

WLEO-PONCE

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$4.00 c/u. 120.00

WPRM-FM

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$18.00 c/u. 540.00

WBMJ-SAN JUAN

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$33.00 c/u. 990.00

WCHN-ARECIBO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 14 a \$4.00 c/u. 60.00

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CONITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-11 P

DATE:

- 4 -

WALO-HUMACAO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$5.00 c/u. \$ 75.00

WXRF-GUAYAMA

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$6.00 c/u. 90.00

WHDD-FAJARDO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$8.00 c/u. 120.00

WKVM RADIO

Por concepto de 12 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$4.00 c/u. 288.00

WPRA-NAYAGUEZ

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80a \$4.00 c/u. 120.00

WKAQ-FM-105

Por concepto de 30 cuñas 30 segundos
transmitidas en marzo 14/80 a \$13.00 c/u. 390.00

WQ11-SAN JUAN

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$45.00 c/u. 675.00

WQBS-SAN JUAN

Por concepto de 8 cuñas de 30 segundos
transmitidas en marzo 13,14/80 a \$30.00 c/u. 240.00

WAPA-SAN JUAN

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 13,14/80 a \$16.00 c/u. 160.00

WSOL-LUQUILLO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$2.50 c/u. 75.00

34040481927

JOE FRANCO & ASSOCIATES, INC.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-11 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 5 -

WUNA-AGUADILLA

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$3.50 c/u. \$ 105.00

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo 15
a \$61.00 c/u. 610.00

WKAQ RADIO

Por concepto de 4 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo 16,
1980 a \$61.00 c/u. 244.00

WOBS RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$21.00 c/u. 630.00

WVJP-CAGUAS

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$4.00 c/u. 120.00

WIAC RADIO-FM

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 durante el
día a \$12.00 c/u. 360.00

WIAC RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 durante el
día a \$18.00 c/u. 540.00

PROGRAMA REMOTO EL 16 DE MARZO/80 DE 6-11 PM

WUNO RADIO

Por concepto de 5 horas de transmisión en marzo
16/80 durante el día. 1,750.00

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-11 P

DATE:

- 6 -

SPOTS DE RADIO PARA MAYOR PARTICIPACION EN LOS PROCESOS ELECTORALES

WUNO RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$15.00 c/u. \$ 150.00

WKVM RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$20.00 c/u. 200.00

WXVM RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas en marzo 16/80 a \$13.00 c/u. 130.00

WAPA RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas en marzo 15,16/80 a \$12.00 c/u. 240.00

WJAC-FM

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$12.00 c/u. 120.00

TOTAL \$ 22,079.00

IRMA M. GOMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

COMITE AHIGOS DE JIMMY CARTER

INVOICE NO. 80-3-12 P

DATE: Marzo 20, 1980

PUBLICACION DE ANUNCIO SOBRE PROGRAMA ESPECIAL
DE TV EL 15 DE MARZO CON CARLOS ROMERO BARCELO
Y CHIP CARTER

EL NUEVO DIA

Por concepto de 1 anuncio de 54 pulgadas
publicado en marzo 15, 1980. (Jimmy
Carter hacia otro triunfo)

\$ 918.00

TEMPO CREATIVE SERVICES, INC.

Por concepto de arte y 2 negativos
para anuncio de prensa publicado en
marzo 15, 1980.

353.00

ANUNCIO EN CADENA RADIAL EL DIA DE LAS PRIMARIAS

EL NUEVO DIA

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

510.00

EL MUNDO

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

510.00

THE SAN JUAN STAR

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

420.00

NATIONAL TYPESETTING SERVICES

Por concepto de tipografía para anuncio
de prensa publicado en El Nuevo Dia, El Mundo,
The San Juan Star en marzo 15, 1980.

225.00

TEMPO CREATIVE SERVICES, INC.

Por concepto de arte y 4 negativos para
anuncio de prensa.

176.00

TOTAL

\$ 2,912.00

IRMA M. GOMEZ

Varwies

5/31

Bal \$ 2463.24

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

COMITE PRO VICTORIA 80

INVOICE NO. 80-4-31 P

DATE: Mayo 13, 1980

TEMPO CREATIVE SERVICES (Fact. 80-4-109)
Por concepto de arte final e impresión de
2,000 tarjetas de recordatorio de donaciones.

\$ 35.00

EXPRESS PRINTS (Fact. 80-4-177)
Por concepto de tickets numerados.

150.00

TEMPO CREATIVE SERVICES (Fact. 80-4-43)
Por concepto impresión de 2,000 notitas
("Favor de hacer cheque a nombre de ...")

18.00

TOTAL

\$ 203.00

34040481931

IRMA M. GÓMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER
(COMITE VICTORIA 80)

INVOICE NO. 80-5-30 P

DATE: Mayo 30, 1980

PRO FORMA

PRENSA

EL NUEVO DIA

Por concepto de 1 anuncio de 21
pulgadas publicado en mayo 13, 1980.

\$ 357.00

THE SAN JUAN STAR

Por concepto de 1 anuncio de 21 pulgadas
publicado en mayo 13, 15, 1980.

588.00

Total Prensa \$ 945.00

PRODUCCION

Por arte, fotostáticas y 2 negativos
para anuncio de prensa de 21 pulgadas.

185.00

Por ilustración de caricatura para
invitación.

20.00

Total Prod. 205.00

TOTAL \$1,150.00

PAID
005
3/4/80

IRMA M. GOMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-5-31 P

COMITE AMIGOS DE JIMMY CARTER
HATO REY, P.R.

DATE: Mayo 30, 1980

ATT: A. VIERA MARTINEZ

PROMOCION RADIO

WUNO RADIO

Por concepto de 10 cuñas de Radio de 30 segundos transmitidas en mayo 23, 24, 1980.

\$ 150.00

WKAQ RADIO

Por concepto de 10 cuñas de Radio de 30 segundos transmitidas local en mayo 23, 24, 1980.

200.00

TOTAL

\$ 350.00

TERESA M. GOMEZ

005
3/4/80

34040481955

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER
VICTORIA 80

INVOICE NO. 80-5-32 P.

DATE: Junio 2, 1980

PRO FORMA

Gastos actividad 16 de mayo/80
Banquete Victoria 80

CONDADO HOLIDAY INN

Por comida y bebida según contrato.

\$ 19,076.00

SOUNDMAKERS OF P.R.

Por servicio de amplificación y
sonido en banquete.

350.00

CHUPY PORRATA

Por grupo musical amenizó actividad.

550.00

ANEXO 3

Por show y cantantes.

1,600.00

TOTAL

\$ 21,576.00

84040481934

YSA M. GOMEZ

PAID
Varios
5/31/80

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CONITE AMIGOS DE JIMMY CARTER
(VICTORIA 80)

INVOICE NO. 80-5-34 P

DATE: Junio 2, 1980

TEMPO SOUND (Fact. 80-5-104)

Por grabación de 2 cuñas de 30 segundos
mezcla, tapes, 3 broadcast cartridges y
3-3 track cartridges. (Feria de las Primarias)

TOTAL \$ 176.50

84040481935

YOLIA M. GONZALEZ

PAID
Ch. No. 005
3-4-80
Date

ADDRESS:

ATT:

Exhibit 2

[illegible]

84040481936

NAME: COMITE AMIGOS DE JIMMY CARTER

ADDRESS: _____

Exhibit 3

ATT: _____

DATE:	INVOICE:	DEBITS	CREDITS	BALANCE
12-79	79-12-2	1,247.50 ⁽³⁾		1,247.50
2-80	80-2-16 Recordings & Printings	40,750.24 ⁽¹⁾⁽²⁾	Bal. 1,750.24 ⁽⁴⁾	41,997.74
2-27-0	PAYMENT		35,000.00 ⁽¹⁾	6,997.74
3-80	80-3-7 (Radio & TV)	34,410.00 ⁽⁵⁾⁽⁶⁾⁽⁷⁾	Bal. 409.33	41,407.74
3-80	80-3-8 (Prod. & TV)	24,825.00		66,232.74
3-80	80-3-9 (Radio Marathons)	17,076.00 ⁽³⁾		83,308.74
3-80	80-3-10 TV Campaign & Printing	74,878.80		158,187.54
3-80	80-3-11 (Radio Spots)	22,079.00		180,266.54
3-80	80-3-12 Radio Program & Press	2,912.00 ⁽⁴⁾	Bal. 2,463.24	183,178.54
3-31-80	PAYMENT		4,000.00 ⁽²⁾	179,178.54
3-4-80	PAYMENT		20,000.00 ⁽³⁾	159,178.54
4-80	80-4-31 (Printing)	203.00		159,381.54
5-80	80-5-30 (Press ad)	1,150.00 ⁽³⁾		160,531.54
5-80	80-5-31 (Radio Spots)	350.00 ⁽³⁾		160,881.54
5-80	80-5-32 (Money-raising act.)	21,576.00 ⁽⁴⁾		182,457.54
5-80	80-5-34 (Radio Production)	176.50 ⁽³⁾		182,634.04
5-31-80	PAYMENT		31,775.00 ⁽⁴⁾	150,859.04
5-31-80	Promotion Spots	7,000.00 ⁽⁴⁾		157,859.04
8-29-80	PAYMENT		32,733.83 ⁽⁵⁾	125,125.21
8-7-80	PAYMENT		1,150.00 ⁽⁶⁾	123,975.21

- 2 -

ADDRESS: _____

ATT: _____

[illegible]

Exhibit 4

COMITE AMIGOS DE JIMMY CARTER

Information about payments received:

Invoices Paid

No. 79-12-2	Press ad	\$ 1,247.50
80-2-16	Recording & printing	40,750.24
80-3-9	Radio Marathons	17,076.00
80-3-7	Radio & TV spots	409.33
80-3-12	Radio Programs & press	448.76
80-4-1	Printing	203.00
80-5-30	Press ad	1,150.00
80-5-31	Radio spots	350.00
80-5-32	Money-raising Activity	21,576.00
80-5-34	Radio production	176.50
80-5-32A	Promotion spots	8,000.00

\$ 91,387.33

Payments received

Feb. 27/80	\$35,000.00(1)
Mar. 31/80	4,000.00(2)
Mar. 6/80	20,000.00(3)

In payment of
80-2-16 \$ 40,750.24

79-12-2	\$ 1,247.50
80-3-9	17,076.00
80-5-30	1,150.00
80-5-34	176.50
80-5-31	350.00

\$ 20,000.00

May 31/80	31,775.00 (4)
-----------	---------------

80-2-16	\$ 1,750.24
80-3-12	448.76
80-5-32	21,576.00
80-5-32A	8,000.00

\$ 31,775.00

Aug. 29/80	32,733.83(5)
	1,150.00(6)
	116.84(7)

80-3-7 \$ 34,410.00

\$34,000.67



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 6, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Jurado:

This letter is to acknowledge receipt of your letter dated May 15, 1981 in response to the Commission's Order of March 20th.

A review of the response submitted by you indicates that further information is necessary. Therefore, the Commission requests that you answer the enclosed questions and submit your response and documents within five days of your receipt of this notification.

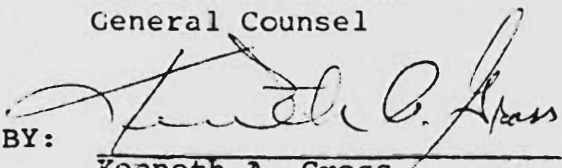
If you have any questions, contact Suzanne Callahan at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Questions (1 page)

BY:


Kenneth A. Gross
Associate General Counsel

84040481940

QUESTIONS

Adalberto Jurado

1. State the name and address of each person who was involved in any way in negotiating the contract between Joe Franco and the committee. (Include the names of individuals representing Joe Franco.)
2. Explain, in detail, the terms of the contract between Joe Franco and the Committee; in lieu thereof, a verified copy of the contract may be submitted. Submit all documents in any way relating to the contract agreement between Joe Franco and the Committee.
3. Explain in detail the financial arrangements between Joe Franco and the Committee. Include in your response what type of credit was extended to the committee by Joe Franco and whether any funds were required by Joe Franco prior to production of the advertisements.
4. Name all individuals involved in the development, preparation, and approval of all media production designed for the committee on behalf of Jimmy Carter. (In your response, include the address, occupation, principal place of business and phone number of all named individuals.)
5. Submit legible copies of all correspondence, memoranda and other documents relating to your transactions with Joe Franco in connection with his billings to the Committee as well as invoices which show the money owed by your committee to Joe Franco. (Include all written documents from all parties including, if applicable, collection agencies.)
6. Provide a list of volunteers who worked for the committee including name, address and phone number and duties with the committee.

In response to the Commission's Order of March 20, 1981, you state ". . . a group of Democrats on their individual capacities, and without connection with the committee, have paid Mr. Franco an additional amount of \$34,241.37 dollars to be credited to the outstanding debt and which stands as of this letter at \$124,858.37."
7. In regard to the above statement, provide a detailed, itemized list of each individual involved with the subject payments totalling \$34,241.37 including but not limited to the name, address, phone number, amount paid and date of payment.
8. How were the individuals, named in your response to Question #7, solicited and/or made aware of the outstanding debt owed Joe Franco by the Comité Amigos de Jimmy Carter (hereinafter "the Committee")?
9. Describe the circumstances of how and when you became aware of the \$34,241.37 payment by a "group of Democrats" to Joe Franco.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

July 6, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joe Franco
Joe Franco and Associates, Inc.
120 Ashford Avenue
San Juan, Puerto Rico 00907

RE: MUR 1354

Dear Mr. Franco:

The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order which requires you, or a designated agent, to provide certain information has been issued. The Commission does not consider you a respondent in this matter, but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

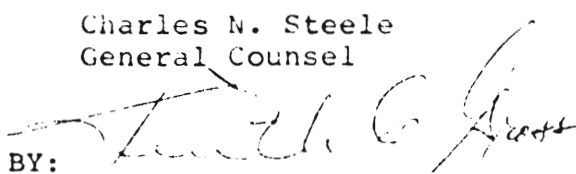
You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this order.

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Order
Questions (2 pages)

BY: 
Kenneth A. Gross
Associate General Counsel

QUESTIONS

Joe Franco & Associates, Inc.

Information in the possession of the Commission indicates that your company, Joe Franco & Associates, Inc. ("Associates"), contracted with the Comite Amigos de Jimmy Carter ("the Committee") for media services on behalf of the presidential primary campaign of Jimmy Carter. Our records indicate that the subject contracted services totalling \$218,099.74.

1. Is the information correct? Please explain in detail the services rendered by Joe Franco & Associates, Inc. Submit all documents which support your statements including copies of all invoices in connection with services completed for the Comite Amigos de Jimmy Carter.
2. State the name and address of each person who was involved in any way in negotiating the contract between Associates and the Committee.
3. Explain, in detail, the terms of the contract between Associates and the Committee; in lieu thereof, a verified copy of the contract may be submitted. Submit all documents in any way relating to the contract/agreement between Associates and the Committee including correspondence and memoranda.
4. Explain, in detail, the financial arrangements between Associates and the Committee. Include in your response what type of credit was extended to the Committee by Associates and whether any funds were required by Associates prior to production of advertisements.
5. Is it Associates' policy to contract for media services on a credit basis? Describe Associates' credit policy in detail.
6. Did Associates provide or assist in the preparation of the text for the Committee? (a) If your response is in the negative, explain. (b) If your response is in the affirmative, name all individuals involved in the development, preparation, and approval of all media production designed for the Committee on behalf of Jimmy Carter. (In your response, include the address, occupation, principal place of business and phone number of all named individuals.)
7. Itemize all contracts made by Associates with individuals or groups of persons in connection with media services on behalf of the primary campaign of Jimmy Carter.
8. Describe, in detail, all efforts made by Associates to secure payment of funds owed you by the Committee.
9. Was a collection agency ever employed by Associates to recover funds owed you by the Committee? Please detail your response.
10. Submit legible copies of all correspondence, memoranda and other documents in connection with your billings to the Committee concerning the money owed by them to Associates. (Include all written documents from all parties including, if applicable, collection agencies.)

3 4 0 4 0 4 8 1 9 4 4

QUESTIONS

Joe Franco & Associates, Inc.

Page 2

Information in the possession of the Commission indicates that a group of individuals paid Associates an amount totalling \$34,241.37 against the outstanding debt owed Associates by the Committee.

11. In regard to the above statement, provide a detailed, itemized list of each individual involved with the subject payments totalling \$34,241.37 including but not limited to the name, address, phone number, amount paid and date of payment.
12. Describe the circumstances of how the individuals named in your response above intervened to make the subject payments against the Committee's debt (i.e., how was Associates contacted, etc.).
13. Provide the Commission with a detailed itemization of any payments made to Associates by any individuals or groups other than the Committee against the outstanding debt owed by the Committee to Associates other than the subject \$34,241.37 discussed above.
14. Provide all documents in connection with payments made by the Committee and/or any other persons to Associates for services rendered under contract to the Committee for the \$218,099.74 in services provided to the Committee.

34040481945

BEFORE THE FEDERAL ELECTION COMMISSION

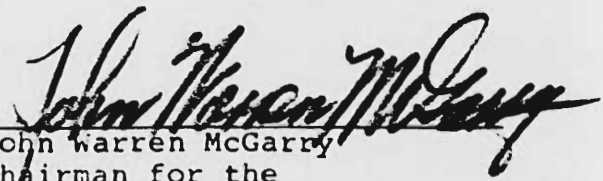
Joe Franco)
Joe Franco and Associates, Inc.) MUR 1354
120 Ashford Avenue)
San Juan, Puerto Rico 00907)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

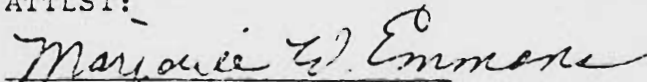
Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on July 2, , 1981.


John Warren McGarry
Chairman for the
Federal Election Commission

ATTEST:


Marjorie W. Emmons
Secretary to the Commission

Attachment

84040481946



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
DATE: JULY 2, 1981
SUBJECT: SUBPOENA RE: MUR 1354

The attached subpoena regarding MUR 1354, which was Commission approved on June 26, 1981 by a vote of 6-0, has been signed and sealed this date.

84040481947

Attachment:
Subpoena

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)
Comite Amigos de Jimmy Carter)

MUR 1354

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on June 26, 1981, the Commission decided by a vote of 6-0 to take the following actions regarding MUR 1354:

1. Approve and send the Order to Joe Franco & Associates, Inc., as submitted with the General Counsel's memorandum dated June 24, 1981.
2. Approve and send the questions to Adalberto Jurado as attached to the General Counsel's June 24, 1981 memorandum.

Commissioners Aikens, Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

6/26/81

Date

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

Received in Office of the Commission Secretary: 6-24-81, 11:11
Circulated on 48 hour vote basis: 6-24-81, 4:00

84040481948

June 24, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Elissa T. Garr
SUBJECT: MUR 1354

Please have the attached Memo distributed to the
Commission on a 48 hour tally basis. Thank you.

84040481949

SENSITIVE



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

RECEIVED
OFFICE OF THE
COMMISSIONER
JUN 24 1981

81 JUN 24 All: 11

June 24, 1981

MEMORANDUM TO: The Commission

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: Authorization to Issue an Order - MUR 1354

On March 19, 1981, based upon a referral from RAD, the Commission found reason to believe that the Comité Amigos de Jimmy Carter violated 2 U.S.C. §434(a)(4), §434(b)(6)(B)(iii), and §434(b)(8). On that same date, the Commission approved an Order to Answer Questions which was sent to the respondent on March 20, 1981.

Adalberto Jurado, treasurer of the respondent committee, submitted answers to the Commission's Order on May 27, 1981.

The response indicates that the Committee made independent expenditures of \$218,099.74 advocating the nomination of Jimmy Carter in the presidential primary in Puerto Rico held on March 16, 1980.

In his response, Jurado states that all expenditures on behalf of Carter made by the Committee "were contracted to Joe Franco & Associates, a local advertising agency."

According to the only report filed by the committee, media expenditures paid to Joe Franco & Associates, Inc., totalled \$218,099.74. The committee had paid Joe Franco \$59,352.72, leaving a balance owed of \$159,099.74.

34040481930

Jurado's recent response to the Commission states that since March 16, 1980, when the committee closed operations, a group of Democrats (allegedly not connected with the committee) paid Joe Franco an additional \$34,241.37, reducing the committee's debt to \$124,858.37 as of this writing.

The information submitted by Mr. Jurado indicates that further questions surrounding the extension of credit to the respondent committee is warranted. Additionally, follow-up questions to the committee are also necessary.

Recommendations

1. Approve and send attached Order to Joe Franco & Associates, Inc.
2. Approve and send attached questions to Adalberto Jurado.

Attachments

Response from Jurado dated May 15, 1981.
Proposed Order
Proposed follow-up questions
Proposed notification letters
(33 total pages attached)

84040481951

May 15, 1981

81 MAY 27 12: 48

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Mr. McGarry:

Within the extension of time granted, I am forwarding you the information requested by the Commission's Order, dated 20th of March, 1981.

In addressing items 1, 2, & 3, I would first like to establish that I did commit an error by placing the \$12,729.32 sum as "independent expenditures", on the report of receipts and expenditures dated April 10, 1980.

The \$218,099.74 were expenses made advocating the nomination of candidate Jimmy Carter for the March 16, 1980 Presidential Primary. They were made without the cooperation, consultation of suggestions of an authorized committee or an agent of the candidate. They should have been placed in the report as "independent expenditures" according to 2 USC 5 431(17).

All these were contracted to Joe Franco and Associates, a local advertising agency. I am accompanying an updated breakdown of the status of the Joe Franco debt that includes an itemized schedule of the services provided and is hereby annexed as Exhibit A.

Since March 16, 1980, date in which "Comité Amigos de Jimmy Carter" closed operations, a group of democrats on their individual capacities, and without any connection with the Committee, have paid Mr. Franco an additional amount of \$34,241.37 dollars to be credited to the outstanding debt and which stands as of this letter at \$124,858.37.

The \$12,729.32 originally reported as independent expenditures were really operational expenses. Such expenses include rental of office space, transportation, food, lodging, gasoline, utilities, painting and refurbishing of offices and related expenses. I felt such expenses were not directly aimed at the nomination of the candidate, but were expenses made in order to keep running the administrative phase of the operation. A schedule is hereby annexed as Exhibit B.

My answer to items 4, 6 & 7 is in the negative. In relation to item 5 the "Comité Amigos de Jimmy Carter" officials were:

Manuel M. Pérez Rodríguez, President
Antonio Alfonso, Secretary
Adalberto Jurado, Treasurer

84040481952

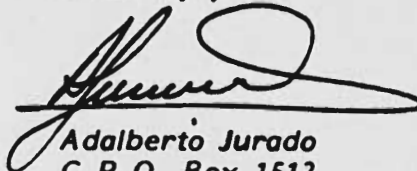
Mr. John Warren McGowan
Page -2-
May 15, 1981

Any of us have been engaged in previous political activity. The rest of the personnel was exclusively made up of volunteers. They received no salary, but we did pay certain expenses for them such as food, lodge, transportation, etc., when needed.

I feel the answer to items 8 & 9 was already given in my letter to the Commission dated April 8, 1981. There I stated that the money raised came from the people's small contributions of nickels, dimes, quarters and one dollar bills in mass activities held such as radio marathons, can collections in the streets, sales of refreshments and snacks, etc. Beside those, I reported to the Commission a list of individual contributions on the "Itemized Receipts Schedule A" report previously filed.

I hope this information fully complies with your request and that this matter would be settled and cleared without further proceedings, once the error I committed is corrected.

Sincerely yours,



Adalberto Jurado
G.P.O. Box 1512
San Juan, Puerto Rico 00936

Annex
/omh

34040481953

"Exhibit A"

JOE FRANCO & ASSOCIATES, Inc.

Advertising

Public Relations

STATEMENT OF ACCOUNT

NAME: COMITE AMIGOS DE JIMMY CARTER

ADDRESS: _____

~~STATE~~ *Outstanding Invoices*

ATT: _____

DATE:	INVOICE:	DEBITS	CREDITS	BALANCE
12-79	79-12-2	1,247.50 (3)		1,247.50
2-80	80-2-16 Recordings & Printings	40,750.24 (1)(2)	Bal 1,750.24 (4)	41,997.74
2-27-80	PAYMENT		35,000.00 (1)	6,997.74
3-80	80-3-7 (Radio & TV)	34,410.00 (5-6-7)	Bal. 409.33	41,407.74
3-80	80-3-8 (Prod. & TV)	24,825.00		66,232.74
3-80	80-3-9 (Radio Marathons)	17,076.00 (3)		83,308.74
3-80	80-3-10 TV Campaign & Printing	74,878.80		158,187.54
3-80	80-3-11 (Radio Spots)	22,079.00		180,266.54
3-80	80-3-12 Radio Program & Press	2,912.00 (4)	Bal. 2,463.24	183,178.54
3-31-80	PAYMENT		4,000.00 (2)	179,178.54
3-4-80	PAYMENT		20,000.00 (3)	159,178.54
4-80	80-4-31 (Printing)	203.00		159,381.54
5-80	80-5-30 (Press ad)	1,150.00 (3)		160,531.54
5-80	80-5-31 (Radio Spots)	350.00 (3)		160,881.54
5-80	80-5-32 (Money-raising act.)	21,576.00 (4)		182,457.54
5-80	80-5-34 (Radio Production)	176.50 (3)		182,634.04
5-31-80	PAYMENT		31,775.00 (4)	150,859.04
5-31-80	Promotion Spots	7,000.00 (4)		157,859.04
8-29-80	PAYMENT		32,733.83 (5)	125,125.21
8-7-80	PAYMENT		1,150.00 (6)	123,975.21

1120 Ashford Avenue/San Juan, Puerto Rico 00907/(809) 725-8445

13

Advertising

Public Relations

- 2 -

ADDRESS: _____

ATT: _____

[illegible]

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE: Marzo 19, 1980

TV & Radio Spots

Feb. 1980

Radio Network Feb. 23/80

Balance due \$ 409.33

TV

SPOTS DE TELEVISION PROMOCION RADIO MARATON 2/23/80.

WKAN TV (Factura 2225-05)

Por concepto de 18 cuñas de TV de 30 segundos transmitidas en Best Sellers (2) en feb. 18 y 25 a \$400.00 c/u; Telenoticias 10PM (5) en feb. 18 al 22 a \$325.00 c/u; Telenoticias 6PM (2) en feb. 19 y 21 a \$375.00 c/u; Quest en feb. 19 a \$400.00; Rockford Files en feb. 20 a \$400.00; Hawaii Five-0 en feb. 21 (2) a \$400.00 c/u; Noche de Gala en feb. 21 a \$600.00; Telenoticias 10PM (2) en feb. 23 y (2) en feb. 24 a \$125.00 c/u.

\$ 5,975.00

WAPA TV (Factura 10486)

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Noticias 11PM (3) en feb. 19 y (2) en feb. 22 a \$300.00 c/u; Police Woman en feb. 19 a \$525.00; Charlie's Angels en feb. 20 a \$620.00; Barnaby Jones en feb. 20 a \$460.00; y Espectacular del Jueves en feb. 21 a \$595.00.

3,200.00

WKSP TV (Factura 80-2-58)

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en el Once en las Noticias en feb. 19, 20, 21, 22/80 a \$355.00 c/u.

1,420.00

WLUZ TV (Factura 385-50)

Por concepto de 8 cuñas de TV de 30 segundos transmitidas en Buenas Noches de feb. 19 al 22/80 a \$80.00 c/u.

640.00

Total TV \$ 11,235.00

5

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

CONITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE:

- 2 -

PRENSA

PROMOCION RADIO MARATON 2/23/80

EL NUEVO DIA (Factura 021084)

Por concepto de 1 anuncio de 40
pulgadas publicado en feb. 22 y 23,
1980. (Gran Radio Maratón)

\$ 1,360.00

TEMPO CREATIVE SERVICES (Factura 80-2-203)

Por concepto de arte final, negativo y
fotostáticas para 1 anuncio de prensa de
40 pulgadas.

290.00

Total Prensa

\$ 1,650.00

RADIO

PROMOCION RADIO MARATON 2/23/80

WKAQ RADIO (Factura 2322-03)

Por concepto de transmisión de 35
cuñas de Radio de 30 segundos en
Radio Reloj A: en feb. 18 al 22/80
a \$61.00 c/u.

2,135.00

CADENA ULTIMA HORA-WLMO (Factura 40)

Por concepto transmisión de 15 cuñas de
30 segundos en Noticias Última Hora en
feb. 18 al 22 a \$36.00 c/u.

540.00

WKVM RADIO (Factura 80-84)

Por concepto transmisión de 15 cuñas de
30 segundos en Show de Alfred de feb.
18 al 22/80 a \$24.00 c/u.

360.00

6

DE FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE:

- 3 -

WTAC RADIO (Factura 39722)

Por concepto transmisión de 15 cuñas de 30 segundos de feb. 18 a 22/80 a \$18.00 c/u. \$ 270.00

WAPA RADIO (Factura 0144)

Por concepto transmisión de 15 cuñas de 30 segundos de feb. 18 al 22/80 a \$16.00 c/u. 240.00

WUEL RADIO (Factura 1230)

Por concepto transmisión de 30 cuñas de 30 segundos en feb. 21 al 22/80. 180.00

WPRM-FM (Factura 0955)

Por concepto transmisión de 10 cuñas de 30 segundos de feb. 21 al 22/80. 180.00

Total Radio 2/23/80 \$ 3,905.00

PROMOCION RADIO MARATON 3/1/80

WKAQ RADIO (Factura 2471-03)

Por concepto transmisión de 20 cuñas de 30 segundos en Radio Reloj AM en feb. 28 y 29/80 a \$61.00 c/u. 1,220.00

CADENA ULTIMA HORA (Factura 60)

Por concepto transmisión de 30 cuñas de 30 segundos en Noticiero Ultima Hora (WUHO) en feb. 28 y 29/80 a \$36.00 c/u. 360.00

Total Radio 3/1/80 1,580.00

Total Promoción Radio \$ 5,485.00

7

DE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE:

- 4 -

CADENA RADIO MARATON 2/23/80 POR LAS SIGUIENTES ESTACIONES

<u>UNO RADIO-RIO PIEDRAS (Fact. 73)</u> 8 horas (incluye remoto)	\$ 2,800.00
<u>WQCI-ARECIBO (Fact. 41684)</u>	960.00
<u>WRIA-AGUADILLA (Fact. 20-F)</u>	800.00
<u>WZAP-PONCE (Fact. 02-0050)</u>	2,200.00
<u>WLEO-PONCE (Fact. 02-0078)</u>	1,000.00
<u>WAFI-NAYAGUEZ (Fact. 22470)</u> 4 1/2 horas.	720.00
<u>WTRA-NAYAGUEZ (Fact. 6224)</u>	640.00
<u>WALO-INSUACAO (Fact. 2-00-338)</u>	700.00
<u>WEGA-VEGA BAJA (Fact. 4762)</u>	800.00
<u>WUJP-CAGUAS (Fact. 31-511)</u>	600.00
<u>WERA-SAN SEBASTIAN (Fact. 80-2-25)</u> 4 1/2 horas.	460.00
<u>WSOL-LUQUILLO (Fact. 1045)</u>	1,200.00
<u>WXPF-CHAYAMA (Fact. F-74)</u>	1,200.00
<u>WUPR-ITUADO (Fact. 2-136-80)</u>	1,200.00

Total Cadena 2/23/80. \$ 16,040.00

TOTAL \$ 34,410.00

IRMA M. GUTZ

DE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-8 P

COMITE AMIGOS DE JIMMY CARTER

DATE: Marzo 20, 1980

TV & Radio Production
TV Spots March 7-14/80

\$ 24,825.

PRODUCCION

TELEVICENTRO FILMS

Por concepto spot de TV, copias (3)
en video tape de 2 segundos de joven,
chica y grupo cantando en avenida "Soy
Demócrata".

\$ 3,150.00

MUSIC SOUND

Por concepto producción de jingle "Es
con Jimmy Carter" incluyendo músicos,
cantantes, licencia, arreglos musicales,
grabación en estudio y derechos de uso
para radio y TV.

2,950.00

TV

TELEVICENTRO FILMS

Por concepto de producción spot de TV de
30 segundos "Es con Jimmy Carter" incluyendo
talento, filmación, edición, locutor, grabación
en sonido y copias en VTR. (Chica cantando en
comité)

3,010.00

RADIO

SPOTS DE RADIO DE 30 SEGUNDOS SOBRE PRIMARIAS JIMMY CARTER

Por grabación en estudio de cuñas de 30
segundos, mixing, copias en tapes y en
cartridges para estaciones de radio inclu-
yendo spots "Primarias Demócratas" "Segunda
Fase Radio Maratón", spot con jingle "Soy
Demócrata" y "Caravana".

1,545.00

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

INVOICE NO. 80-3-8 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 2 -

Grabación de spot en inglés para uso
en estación WMOA.

\$ 270.00

Por pauta y 257 sound track tapes
(8-track) entregados a miembros del
Partido y al Comité (Jingle "Es con
Jimmy Carter")

2,640.00

HECTOR TRAYESO

Por servicios como locutor en cuñas de
radio de 30 segundos campaña de Jimmy
Carter.

1,000.00

SPOT DE RADIO "A LA DERROTA"

Grabación de spot de 30 segundos con
27 cartridges edición y tapes.

530.00

RAUL ROSADO

Por concepto de locución en spot a 2
voces "A la derrota" y en Chappaquiddick.

200.00

TAINO, INC.

Por concepto de producción adicional de
10,500 banderas Carter/Carter adicionales.

4,830.00

TV

WAPA TV

Por concepto de 3 cuñas de 30 segundos
transmitidas en Break 7:58 en marzo 7,
10,12, 1980 a \$370.00 c/u.

1,110.00

WKBH-TV CANAL 11

Por concepto de 6 cuñas de 30 segundos
transmitidas en Novela 9PM en marzo 7
al 14, 1980 a \$350.00 c/u.

2,100.00

DE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-8 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 3 -

WKBM-TV CANAL 11

Por concepto de 3 cuñas de TV de 30 segundos en Break 8:01 en marzo 10, 12, 13, 14, 1980 a \$325.00 c/u.

\$ 1,300.00

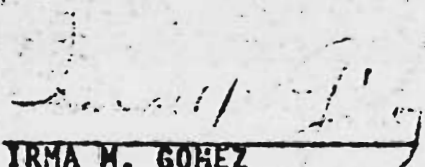
SPOT DE RADIO SOBRE CHAPPAQUIDICK

Por grabación, edición y cartridges para pasar el 3 de marzo de 1980.

190.00

TOTAL

\$ 24,825.00


IRMA M. GOHEZ

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO: COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-10 P

DATE: Marzo 19, 1980

*TV Campaign March 1980
Printing*

CAMPANA DE TV
PRONOCION PRIMARIAS DEMOCRATAS

\$ 74,878.80

WAPA TV

Por concepto de 6 cuñas de TV de 30 segundos transmitidas en Don Cholito 12:45PM en marzo 5,6,7,12,13,14/80 a \$155.00 c/u.

\$ 930.00

WAPA TV

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Station Break 6:29 en marzo 4,5,7,10,11,12,14/80 a \$320.00 c/u.

2,240.00

WAPA TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Station Break 6:58 en marzo 7,8,14,15/80 a \$370.00 c/u.

1,480.00

WAPA TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Station Break 7:58 en marzo 6,8,9,13,15/80 a \$370.00 c/u.

1,850.00

WAPA TV

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Station Break 8:58 en marzo 5,12 a \$415.00 c/u y marzo 6,8,9,13,15/80 a \$385.00 c/u.

2,755.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Police Woman en marzo 4, 1980 a \$420.00.

420.00

WAPA TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Noticentro 6:00PM en marzo 11,13/80 a \$450.00 c/u.

1,800.00

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-84

INVOICE TO

INVOICE NO. 80-3-10

CONITE AMIGOS DE JIMMY CARTER

DATE:

- 2 -

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Fantasy Island en marzo 9, 1980 a \$620.00. \$ 620.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Charlie's Angels en marzo 5, 12/80 a \$620.00 c/u. 1,240.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en UFO en marzo 12/80 a \$590.00. 590.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Barnaby Jones en marzo 5, 12 (2)/80 a \$390.00 c/u. 1,170.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Ay Bendito Que Pueblito en marzo 9/80 a \$475.00 c/u. 950.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Salvaje en marzo 13/80 a \$555.00. 555.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Eight is Enough en marzo 14/80 a \$500.00. 500.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitida en Rich Man.

18

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

INVOICE NO. 80-3-10 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 3 -

Poor Man en marzo 7,14(2)/80 a \$370.00 c/u. \$ 1,110.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Gran Espectacular en marzo 6,13/80 a \$475.00 c/u.

950.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en El Hombre Nuclear en marzo 7,14(2)/80 a \$420.00 c/u.

1,260.00

WAPA TV

Por concepto de 12 cuñas de TV de 30 segundos transmitidas en Noticentro 11PM en marzo 4,5,6,7,8,11,12,13(2),14,15(2)/80 a \$300.00 c/u.

3,600.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Disneylandia en marzo 15/80 a \$375.00.

375.00

Total WAPA TV \$ 24,395.00

WKAQ TV

Por concepto de 14 cuñas de TV de 30 segundos transmitidas en Telenoticias 10PM en marzo 4(2),5,6,7(2),10(2),11(2),12,13,14(2)/80 a \$325.00 c/u.

4,550.00

WKAQ TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Telenoticias 6PM en marzo 4,5,11,12/80 a \$375.00 c/u.

1,500.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Novela 7PM en marzo 14/80 a \$825.00.

825.00

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-101

DATE:

- 4 -

WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Lo Mejor de Hollywood en marzo 8,15(2)/80 a \$300.00 c/u. \$ 900.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Show de Mydia en marzo 9/80 a \$450.00. 450.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Retorno del Santo en marzo 9/80 a \$400.00. 400.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Little House en marzo 9/80 a \$350.00. 350.00

WKAQ TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Best Sellers en marzo 10/80 a \$450.00 c/u. 900.00

WKAQ TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Quest en marzo 4(2) y 11(2) a \$400.00 c/u. 1,600.00

WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Gran Película en marzo 7,14(2)/80 a \$450.00 c/u. 1,350.00

WKAQ TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Rockford Files en marzo 5(2),12(3)/80 a \$400.00 c/u. 2,000.00

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DE FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-10 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 5 -

WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Salsa Sábado en la Noche en marzo 8, 15(2) a \$400.00 c/u. \$ 1,200.00

WKAQ TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Chapulín en marzo 6, 13/80 a \$675.00 c/u. 1,350.00

WKAQ TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Hawaii 5-0 en marzo 6(2)/80 y marzo 13(3)/80 a \$400.00 c/u. 2,000.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Gente Joven en marzo 15/80. 375.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Muppet Show en marzo 15/80. 200.00

Total WKAQ TV \$ 19,950.00

WLUZ TV

Por concepto de 24 cuñas de TV de 30 segundos transmitidas en Buenas Noches en marzo 4 al 14/80 a \$80.00 c/u. 1,920.00

WKBM TV

Por concepto de 12 cuñas de TV de 30 segundos transmitidas en Noticias 10PM en marzo 4-7 y 10-14/80 a \$250.00 c/u. 3,000.00

TOTAL TV \$ 49,265.00

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JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-10

DATE:

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IMPRESOS

TEMPO CREATIVE SERVICES (Fact. 80-3-64,56,14)

Por concepto de impresión y arte de 70,000 posters a dos colores de Jimmy Carter (Vota por el número 1) 11x17.

\$ 3,200.00

RAMALLO BROS (Fact. 10993)

Por concepto de impresión de 20,000 posters 12 1/2 x 20 "Carter" y 20,000 posters 16x 25 "Carter".

4,568.00

TEMPO CREATIVE SERVICES (Fact. 80-2-204 y 80-3-63)

Por concepto impresión de 32,500 fotos de Jimmy Carter con su firma.

1,007.50

TEMPO CREATIVE SERVICES (Fact. 80-3-4)

Por concepto impresión y arte de 55,000 posters 11x17 "Dale tu voto el 16 de marzo".

2,300.00

TEMPO CREATIVE SERVICES (Fact. 80-3-45)

Por concepto impresión de hojas sueltas

750.00

TEMPO CREATIVE SERVICES (Fact. ov-2-125)

Por concepto de impresión y arte de papel carta y 10,000 sobres de Comité Amigos de Jimmy Carter.

155.00

TEMPO CREATIVE SERVICES (Fact. 80-2-202)

Por concepto de arte para bumper stickers y arte de caricatura.

100.00

17

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8441

INVOICE TO:

INVOICE NO. 80-3-10 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 7 -

TEMPO CREATIVE SERVICES (Fact. 80-3-67)

Por concepto de impresión de 50,000 tickets a dos colores "Respaldar al Presidente Carter a usted le corresponde votar".

\$ 1,200.00

TEMPO CREATIVE SERVICES (Fact. 80-2-199)

Por concepto de impresión de posters para Campaña Promoción Radio Maratón 2/23/80.

1,700.00

TEMPO CREATIVE SERVICES (Fact. 80-3-70)

Por concepto de impresión de 20,000 tarjetas "Maratón Sailable"; 60,000 tarjetas "donativo" 1.00 y 200 tarjetas de identificación.

1,350.00

MULTI PLASTICS (Fact. 2797 y 2828)

Por concepto de 25,000 bumper stickers "Re-elige a Carter".

3,700.00

TAINO COLOR LAB. (Fact. 80/23 y 30)

Por concepto de 8,955 banderas "Carter, Carter" a .46¢.

4,119.30

MULTI PLASTICS (Fact. 2845)

Por concepto de 5,000 bumper stickers "Nadie se ahoga".

600.00

MULTI PLASTICS (Fact. 2854)

Por concepto de 4,000 calcomanías "Pres. de Colegio" y 4,000 "Jimmy Carter".

864.00

Total Impresos \$ 25,613.80

TOTAL \$ 74,878.80

IRMA H. GOMEZ

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JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO: 80-3-11

DATE: Marzo 20, 1980

Radio Sports

RADIO

\$ 22,079.

PROMOCION CARAYANA 3-8-80

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj am en marzo
6,7/80 a \$61.00 c/u y 15 locales en marzo
8/80 a \$18.00 c/u.

\$ 880.00

PROMOCION PRIMARIAS DEMOCRATAS

WKAQ RADIO

Por concepto de 25 cuñas de 30 segundos
transmitidas en Radio Reloj am de marzo
10 al 14/80 a \$61.00 c/u.

1,525.00

CAMPANA JIMMY CARTER PRIMARIAS

WJAC RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas en Noti Reloj de marzo 12
al 14/80 a \$18.00 c/u.

324.00

WUNO RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas en Noticiero Ultima Hora en
marzo 12 al 14/80 a \$36.00 c/u.

648.00

WQBS RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas localmente de marzo 12 al
15/80 a \$24.00 c/u.

480.00

WPRP RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 14/80 a \$7.00 c/u.

420.00

WAEI RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 15/80 a \$5.00 c/u.

300.00

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

INVOICE NO: 80-3-11 P

CONITE AMIGOS DE JIMMY CARTER

DATE:

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MCNN RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 15/80 a \$4.00 c/u. \$ 240.00

WNEL-CAGUAS

Por concepto de 60 cuñas de 30 segundos
transmitidas de marzo 12 al 16/80 a \$6.00 c/u. 360.00

WHOA-SAN JUAN

Por concepto de 52 cuñas de 30 segundos
transmitidas de marzo 10 al 15/80 a
\$9.00 c/u. 468.00

WKVN RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas de marzo 12 al 14/80 a
\$24.00 c/u. 432.00

WKAQ RADIO

Por concepto de 90 cuñas de 30 segundos
transmitidas en marzo 14/80 en Radio Reloj
a \$61.00 c/u. 5,490.00

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo
15/80 a \$61.00 c/u. 610.00

WKAQ RADIO

Por concepto de 4 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo
16/80 a \$61.00 c/u. 244.00

TRANSMISION DE SPOT "A LA DERROTA"

30

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

INVOICE NO. 80-3-11 P

CONITE AMIGOS DE JIMMY CARTER

DATE:

WBOZ-SAN GERMAN

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$3.50 c/u. \$ 105.00

WNIA RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$1.70 c/u. 51.00

WKFE-YAUCO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$4.50 c/u. 135.00

WABA-AGUADILLA

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$3.50 c/u. 105.00

WKJV-MAYAGUEZ

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$4.00 c/u. 120.00

WLEO-PONCE

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$4.00 c/u. 120.00

WPRM-FH

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$18.00 c/u. 540.00

WBMJ-SAN JUAN

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$33.00 c/u. 990.00

WCHN-ARECIBO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 14 a \$4.00 c/u. 60.00

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JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8441

INVOICE TO:

INVOICE NO. 80-3-11 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 4 -

WALO-HUNACAO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$5.00 c/u.

\$ 75.00

WXRF-GUAYAMA

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$6.00 c/u.

90.00

WMDD-FAJARDO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$8.00 c/u.

120.00

WKVM RADIO

Por concepto de 12 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$4.00 c/u.

288.00

WPRA-MAYAGUEZ

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80a \$4.00 c/u.

120.00

WKAQ-FM-105

Por concepto de 30 cuñas 30 segundos
transmitidas en marzo 14/80 a \$13.00 c/u.

390.00

WQ11-SAN JUAN

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$45.00 c/u.

675.00

WQBS-SAN JUAN

Por concepto de 8 cuñas de 30 segundos
transmitidas en marzo 13,14/80 a \$30.00 c/u.

240.00

WAPA-SAN JUAN

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 13,14/80 a \$16.00 c/u.

160.00

WSOL-LUQUILLO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$2.50 c/u.

75.00

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JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

INVOICE NO. 80-3-11 P

COMITÉ AMIGOS DE JIMMY CARTER

DATE:

- 5 -

MUNA-AGUADILLA

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$3.60 c/u. \$ 105.00

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo 15
a \$61.00 c/u. 610.00

WKAQ RADIO

Por concepto de 4 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo 16,
1980 a \$61.00 c/u. 244.00

WQBS RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$21.00 c/u. 630.00

WVJP-CAGUAS

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$4.00 c/u. 120.00

WIAC RADIO-FM

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 durante el
día a \$12.00 c/u. 360.00

WIAC RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 durante el
día a \$18.00 c/u. 540.00

PROGRAMA REMOTO EL 16 DE MARZO/80 DE 6-11 PM

WUNO RADIO

Por concepto de 5 horas de transmisión en marzo
16/80 durante el día. 1,750.00

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JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-11 P

DATE

SPOTS DE RADIO PARA MAYOR PARTICIPACION EN LOS PROCESOS ELECTORALES

WUNO RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$15.00 c/u.

\$ 150.00

WKVM RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$20.00 c/u.

200.00

WZVM RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas en marzo 16/80 a \$13.00 c/u.

130.00

WAPA RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas en marzo 15,16/80 a \$12.00 c/u.

240.00

WJAC-FM

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$12.00 c/u.

120.00

TOTAL

\$ 22,079.00

IRMA H. GÓMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-12 P

DATE: Marzo 20, 1980

Press + press production

Balance \$ 2463.24

**PUBLICACION DE ANUNCIO SOBRE PROGRAMA ESPECIAL
DE TV EL 15 DE MARZO CON CARLOS ROMERO BARCELO
Y CHIP CARTER**

EL NUEVO DIA

Por concepto de 1 anuncio de 54 pulgadas
publicado en marzo 15, 1980. (Jimmy
Carter hacia otro triunfo)

\$ 918.00

TEMPO CREATIVE SERVICES, INC.

Por concepto de arte y 2 negativos
para anuncio de prensa publicado en
marzo 15, 1980.

353.00

ANUNCIO EN CADENA RADIAL EL DIA DE LAS PRIMARIAS

EL NUEVO DIA

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

510.00

EL MUNDO

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

510.00

THE SAN JUAN STAR

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

420.00

NATIONAL TYPESETTING SERVICES

Por concepto de tipografia para anuncio
de prensa publicado en El Nuevo Dia, El Mundo,
The San Juan Star en marzo 15, 1980.

225.00

TEMPO CREATIVE SERVICES, INC.

Por concepto de arte y 4 negativos para
anuncio de prensa.

176.00

TOTAL

\$ 2,912.00

IRMA M. GOMEZ

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JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-4-31 P

DATE: Mayo 13, 1980

Printing

\$203.

TEMPO CREATIVE SERVICES (Fact. 80-4-109)
Por concepto de arte final e impresión de
2,000 tarjetas de recordatorio de donaciones.

\$ 35.00

EXPRESS PRINTS (Fact. 8001977)
Por concepto de tickets numerados.

150.00

TEMPO CREATIVE SERVICES (Fact. 80-4-43)
Por concepto de impresión 2,000 notitas
("Favor de hacer cheque a nombre de...")

18.00

TOTAL

\$ 203.00

34040481977

Irma M. Gomez
IRMA M. GOMEZ

Ho

OPERATIONAL EXPENSES

Period: February 19, 1980 - March 16, 1980

Rental of real property, office equipment, and
vehicles.----- \$3,432.35

Food, lodge and transportation for officers
and volunteers.----- 2,581.78

Paint, hardware and cleaning materials related
to the refurbishing preparation and maintenance
of premises used as office space. ----- 4,986.73

Gasoline and maintenance cost for vehicles.----- 1,728.46

Total ----- \$12,729.32

84040481978

BEFORE THE FEDERAL ELECTION COMMISSION

Joe Franco)
Joe Franco and Associates, Inc.) MUR 1354
120 Ashford Avenue)
San Juan, Puerto Rico 00907)

SUBPOENA TO PRODUCE DOCUMENTS
ORDER TO SUBMIT WRITTEN ANSWERS

Pursuant to 2 U.S.C. § 437d(a)(1) and (3) and in furtherance of its investigation in the above-captioned matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order and Subpoenas you to produce requested documents.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order/Subpoena.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand on _____, 198 .

John Warren McGarry
Chairman for the
Federal Election Commission

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment

QUESTIONS

Joe Franco & Associates, Inc.

Information in the possession of the Commission indicates that your company, Joe Franco & Associates, Inc. ("Associates"), contracted with the Comite Amigos de Jimmy Carter ("the Committee") for media services on behalf of the presidential primary campaign of Jimmy Carter. Our records indicate that the subject contracted services totalling \$218,099.74.

1. Is the information correct? Please explain in detail the services rendered by Joe Franco & Associates, Inc. Submit all documents which support your statements including copies of all invoices in connection with services completed for the Comite Amigos de Jimmy Carter.
2. State the name and address of each person who was involved in any way in negotiating the contract between Associates and the Committee.
3. Explain, in detail, the terms of the contract between Associates and the Committee; in lieu thereof, a verified copy of the contract may be submitted. Submit all documents in any way relating to the contract/agreement between Associates and the Committee including correspondence and memoranda.
4. Explain, in detail, the financial arrangements between Associates and the Committee. Include in your response what type of credit was extended to the Committee by Associates and whether any funds were required by Associates prior to production of advertisements.
5. Is it Associates' policy to contract for media services on a credit basis? Describe Associates' credit policy in detail.
6. Did Associates provide or assist in the preparation of the text for the Committee? (a) If your response is in the negative, explain. (b) If your response is in the affirmative, name all individuals involved in the development, preparation, and approval of all media production designed for the Committee on behalf of Jimmy Carter. (In your response, include the address, occupation, principal place of business and phone number of all named individuals.)
7. Itemize all contracts made by Associates with individuals or groups of persons in connection with media services on behalf of the primary campaign of Jimmy Carter.
8. Describe, in detail, all efforts made by Associates to secure payment of funds owed you by the Committee.
9. Was a collection agency ever employed by Associates to recover funds owed you by the Committee? Please detail your response.
10. Submit legible copies of all correspondence, memoranda and other documents in connection with your billings to the Committee concerning the money owed by them to Associates. (Include all written documents from all parties in applicable collection agency records.)

84040481930

QUESTIONS

Joe Franco & Associates, Inc.

Page 2

Information in the possession of the Commission indicates that a group of individuals paid Associates an amount totalling \$34,241.37 against the outstanding debt owed Associates by the Committee.

11. In regard to the above statement, provide a detailed, itemized list of each individual involved with the subject payments totalling \$34,241.37 including but not limited to the name, address, phone number, amount paid and date of payment.
12. Describe the circumstances of how the individuals named in your response above intervened to make the subject payments against the Committee's debt (i.e., how was Associates contacted, etc.).
13. Provide the Commission with a detailed itemization of any payments made to Associates by any individuals or groups other than the Committee against the outstanding debt owed by the Committee to Associates other than the subject \$34,241.37 discussed above.
14. Provide all documents in connection with payments made by the Committee and/or any other persons to Associates for services rendered under contract to the Committee for the \$218,099.74 in services provided to the Committee.

34040481931

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QUESTIONS

Adalberto Jurado

1. State the name and address of each person who was involved in any way in negotiating the contract between Joe Franco and the committee. (Include the names of individuals representing Joe Franco.)
2. Explain, in detail, the terms of the contract between Joe Franco and the Committee; in lieu thereof, a verified copy of the contract may be submitted. Submit all documents in any way relating to the contract agreement between Joe Franco and the Committee.
3. Explain in detail the financial arrangements between Joe Franco and the Committee. Include in your response what type of credit was extended to the committee by Joe Franco and whether any funds were required by Joe Franco prior to production of the advertisements.
4. Name all individuals involved in the development, preparation, and approval of all media production designed for the committee on behalf of Jimmy Carter. (In your response, include the address, occupation, principal place of business and phone number of all named individuals.)
5. Submit legible copies of all correspondence, memoranda and other documents relating to your transactions with Joe Franco in connection with his billings to the Committee as well as invoices which show the money owed by your committee to Joe Franco. (Include all written documents from all parties including, if applicable, collection agencies.)
6. Provide a list of volunteers who worked for the committee including name, address and phone number and duties with the committee.

In response to the Commission's Order of March 20, 1981, you state ". . . a group of Democrats on their individual capacities, and without connection with the committee, have paid Mr. Franco an additional amount of \$34,241.37 dollars to be credited to the outstanding debt and which stands as of this letter at \$124,858.37."
7. In regard to the above statement, provide a detailed, itemized list of each individual involved with the subject payments totalling \$34,241.37 including but not limited to the name, address, phone number, amount paid and date of payment.
8. How were the individuals, named in your response to Question #7, solicited and/or made aware of the outstanding debt owed Joe Franco by the Comite Amigos de Jimmy Carter (hereinafter "the Committee")?
9. Describe the circumstances of how and when you became aware of the \$34,241.37 payment by a "group of Democrats" to Joe Franco.



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

Adalberto Jurado
GPO box 1512
San Juan, Puerto Rico 00936

RE: MUR 1354

Dear Mr. Jurado:

This letter is to acknowledge receipt of your letter dated May 15, 1981 in response to the Commission's Order of March 20th.

A review of the response submitted by you indicates that further information is necessary. Therefore, the Commission requests that you answer the enclosed questions and submit your response and documents within five days of your receipt of this notification.

If you have any questions, contact Suzanne Callahan at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

Enclosure
Questions (1 page)

34040481935

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Joe Franco
Joe Franco and Associates, Inc.
120 Ashford Avenue
San Juan, Puerto Rico 00907

RE: MUR 1354

Dear Mr. Franco:

3 4 0 4 0 4 8 1 9 3 4
The Federal Election Commission, established in April, 1975, has the statutory duty of enforcing the Federal Election Campaign Act of 1971, as amended, and Chapters 95 and 96 of Title 26 Internal Revenue Code of 1954. In connection with an investigation being conducted by the Commission, the attached order which requires you, or a designated agent, to provide certain information has been issued. The Commission does not consider you a respondent in this matter, but rather as a witness only.

Since this information is being sought as part of an investigation being conducted by the Commission, the confidentiality provisions of 2 U.S.C. §437g(a)(12)(A) apply. This section of the Act prohibits the making public of any investigation conducted by the Commission without the express written consent of the person with respect to whom the investigation is made.

3 4 0 4 0 4 8 1 9 3 4
You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this order.

If you have any questions, please direct them to Suzanne Callahan, the staff member handling this matter, at (202) 523-4057.

Sincerely,

Charles N. Steele
General Counsel

Enclosures
Order
Questions (2 pages)

33



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
DATE: JUNE 5, 1981
SUBJECT: MUR 1354 - Interim Investigative Report #1,
dated 6-3-81; Received in OCS 6-3-81,
3:42

The above-named document was circulated to the
Commission on a 24 hour no-objection basis at 11:00,
June 4, 1981.

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

34040481935

June 3, 1981

MEMORANDUM TO: Marjorie W. Emmons
FROM: Phyllis A. Kayson
SUBJECT: MUR 1354

Please have the attached Interim Investigative Report distributed to the Commission on a 24 hour no-objection basis. Thank you.

Attachment

cc: Callahan

34040481936

BEFORE THE FEDERAL ELECTION COMMITTEE

RECEIVED
OFFICE OF THE
CLERK OF THE
COMMISSION

In the Matter of)

81 JUN 3 P 3: 42

MUR 1354

Comite Amigos de Jimmy Carter)


SENSITIVE

INTERIM INVESTIGATIVE REPORT #1

On April 8, 1981, the Comite Amigos de Jimmy Carter submitted a request for an extension of 30 days in which to respond to the Commission's Order of March 20, 1981. The respondent was notified by the Office of General Counsel on April 17, 1981, that the request had been granted and its response must be filed by the close of business May 15, 1981.

A response to the order has been received and is currently being reviewed and analyzed by this office. The initial review of the respondent's submission reveals additional irregularities and the necessity for further investigation. A report recommending further action to the Commission will be made shortly.

3 June 1981
Date


Charles N. Steele
General Counsel

34040461937



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *mwe*
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
DATE: MAY 27, 1981
SUBJECT: REFERRAL OF LETTER REGARDING COMITE AMIGOS
DE JIMMY CARTER (MUR 1354)

The attached letter regarding response to Commission order was received in Chairman McGarry's office and then forwarded to the Secretary of the Commission. It is provided for your action.

81 MAY 28 4:37

GENERAL COUNSEL

Attachment:

Letter from Manuel M. Perez Rodriguez
Dated May 15, 1981

84040481938

RECEIVED
MAY 15, 1981

81 MAY 27 P12: 48

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington, D.C. 20463

Dear Mr. McGarry:

Within the extension of time granted, I am forwarding you the information requested by the Commission's Order, dated 20th of March, 1981.

In addressing items 1, 2, & 3, I would first like to establish that I did commit an error by placing the \$12,729.32 sum as "independent expenditures", on the report of receipts and expenditures dated April 10, 1980.

The \$218,099.74 were expenses made advocating the nomination of candidate Jimmy Carter for the March 16, 1980 Presidential Primary. They were made without the cooperation, consultation of suggestions of an authorized committee or an agent of the candidate. They should have been placed in the report as "independent expenditures" according to 2 USC S 431(17).

All these were contracted to Joe Franco and Associates, a local advertising agency. I am accompanying an updated breakdown of the status of the Joe Franco debt that includes an itemized schedule of the services provided and is hereby annexed as Exhibit A.

Since March 16, 1980, date in which "Comité Amigos de Jimmy Carter" closed operations, a group of democrats on their individual capacities, and without any connection with the Committee, have paid Mr. Franco an additional amount of \$34,241.37 dollars to be credited to the outstanding debt and which stands as of this letter at \$124,858.37.

The \$12,729.32 originally reported as independent expenditures were really operational expenses. Such expenses include rental of office space, transportation, food, lodging, gasoline, utilities, painting and refurbishing of offices and related expenses. I felt such expenses were not directly aimed at the nomination of the candidate, but were expenses made in order to keep running the administrative phase of the operation. A schedule is hereby annexed as Exhibit B.

My answer to items 4, 6 & 7 is in the negative. In relation to item 5 the "Comité Amigos de Jimmy Carter" officials were:

Manuel M. Pérez Rodríguez, President
Antonio Alfonso, Secretary
Adalberto Jurado, Treasurer

78:64 82100

84040481932

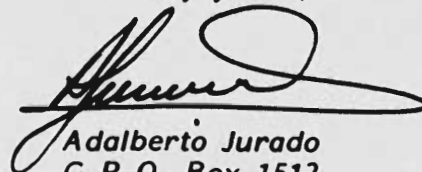
Mr. John Warren McGowan
Page -2-
May 15, 1981

Any of us have been engaged in previous political activity. The rest of the personnel was exclusively made up of volunteers. They received no salary, but we did pay certain expenses for them such as food, lodge, transportation, etc., when needed.

I feel the answer to items 8 & 9 was already given in my letter to the Commission dated April 8, 1981. There I stated that the money raised came from the people's small contributions of nickels, dimes, quarters and one dollar bills in mass activities held such as radio marathons, can collections in the streets, sales of refreshments and snacks, etc. Beside those, I reported to the Commission a list of individual contributions on the "Itemized Receipts Schedule A" report previously filed.

I hope this information fully complies with your request and that this matter would be settled and cleared without further proceedings, once the error I committed is corrected.

Sincerely yours,



Adalberto Jurado
G.P.O. Box 1512
San Juan, Puerto Rico 00936

Annex
/omh

84040481990

"Exhibit A"

JOE FRANCO & ASSOCIATES, Inc.

Advertising

Public Relations

STATEMENT OF ACCOUNT

NAME: COMITE AMIGOS DE JIMMY CARTER

ADDRESS: _____

Outstanding Invoices

ATT: _____

DATE:	INVOICE:	DEBITS	CREDITS	BALANCE
12-79	79-12-2	1,247.50 ⁽³⁾		1,247.50
2-80	80-2-16 Recordings & Printings	40,750.24 ⁽¹⁾⁽²⁾	Bal 1,750.24 ⁽⁴⁾	41,997.74
2-27-0	PAYMENT		35,000.00 ⁽¹⁾	6,997.74
3-80	80-3-7 (Radio & TV)	34,410.00 ⁽⁵⁻⁶⁻⁷⁾	Bal. 409.33	41,407.74
3-80	80-3-8 (Prod. & TV)	24,825.00		66,232.74
3-80	80-3-9 (Radio Marathons)	17,076.00 ⁽³⁾		83,308.74
3-80	80-3-10 TV Campaign & Printing	74,878.80		158,187.54
3-80	80-3-11 (Radio Spots)	22,079.00		180,266.54
3-80	80-3-12 Radio Program & Press	2,912.00 ⁽⁴⁾	Bal. 2,463.24	183,178.54
3-31-80	PAYMENT		4,000.00 ⁽²⁾	179,178.54
3-4-80	PAYMENT		20,000.00 ⁽³⁾	159,178.54
4-80	80-4-31 (Printing)	203.00		159,381.54
5-80	80-5-30 (Press ad)	1,150.00 ⁽³⁾		160,531.54
5-80	80-5-31 (Radio Spots)	350.00 ⁽³⁾		160,881.54
5-80	80-5-32 (Money-raising act)	21,576.00 ⁽⁴⁾		182,457.54
5-80	80-5-34 (Radio Production)	176.50 ⁽³⁾		182,634.04
5-31-80	PAYMENT		31,775.00 ⁽⁴⁾	150,859.04
5-31-80	Promotion Spots	7,000.00 ⁽⁴⁾		157,859.04
8-29-80	PAYMENT		32,733.83 ⁽⁵⁾	125,125.21
8-7-80	PAYMENT		1,150.00 ⁽⁶⁾	123,975.21

Advertising

Public Relations

- 2 -

ADDRESS:

ATT:

1120 Ashford Avenue/San Juan, Puerto Rico 00907/(809) 725-8445

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00967 / (809) 725-8445

INVOICE TO:
COMITE AEROS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE: March 19, 1980

TV & Radio Spots

Feb. 1980

Radio Network Feb. 23/80

Balance due \$ 409.33

TV

SPOTS DE TELEVISION PROMOCION RADIO MARATON 2/23/80.

WKAQ TV (Factura 2225-05)

Por concepto de 18 cuñas de TV de 30 segundos transmitidas en Best Sellers (2) en feb. 18 y 25 a \$400.00 c/u; Telenoticias 10PM (5) en feb. 18 al 22 a \$325.00 c/u; Telenoticias 6PM (2) en feb. 19 y 21 a \$375.00 c/u; Quest en feb. 19 a \$400.00; Rockford Files en feb. 20 a \$400.00; Hawaii Five-00 en feb. 21 (2) a \$400.00 c/u; Noche de Gala en feb. 21 a \$600.00; Telenoticias 10PM (2) en feb. 23 y (2) en feb. 24 a \$125.00 c/u.

\$ 5,975.00

WAPA TV (Factura 10486)

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Noticias 11PM (3) en feb. 19 y (2) en feb. 22 a \$300.00 c/u; Police Woman en feb. 19 a \$525.00; Charlie's Angels en feb. 20 a \$620.00; Barnaby Jones en feb. 20 a \$460.00; y Espectacular del Jueves en feb. 21 a \$695.00.

3,200.00

WKAH TV (Factura 80-2-58)

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en el Once en las Noticias en feb. 19, 20, 21, 22/80 a \$355.00 c/u.

1,420.00

WLUZ TV (Factura 335-60)

Por concepto de 6 cuñas de TV de 30 segundos transmitidas en Buenas Noches de feb. 19 al 22/80 a \$60.00 c/u.

640.00

Total TV

\$ 11,235.00

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-7 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 2 -

PRENSA

PROMOCION RADIO MARATON 2/23/80

EL NUEVO DIA (Factura 021084)

Por concepto de 1 anuncio de 40
pulgadas publicado en feb. 22 y 23,
1980. (Gran Radio Maratón)

\$ 1,360.00

TEMPO CREATIVE SERVICES (Factura 80-2-203)

Por concepto de arte final, negativo y
fotostáticas para 1 anuncio de prensa de
40 pulgadas.

290.00

Total Prensa

\$ 1,650.00

RADIO

PROMOCION RADIO MARATON 2/23/80

WKAJ RADIO (Factura 2322-03)

Por concepto de transmisión de 35
cuñas de RADIO de 30 segundos en
Radio Reloj A! en feb. 18 al 22/80
a \$61.00 c/u.

2,135.00

CADENA ULTIMA HORA-WUNO (Factura 40)

Por concepto transmisión de 15 cuñas de
30 segundos en Héticiero Ultime Hora en
feb. 18 al 22 a \$36.00 c/u.

540.00

WKVJ RADIO (Factura 80-84)

Por concepto transmisión de 15 cuñas de
30 segundos en Show de Alfred de feb.
18 al 22/80 a \$24.00 c/u.

360.00

DE FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE:

- 3 -

WJAC RADIO (Factura 39722)

Por concepto transmisión de 15 cuñas de 30 segundos de feb. 18 a 22/80 a \$18.00 c/u. \$ 270.00

WAPA RADIO (Factura 0144)

Por concepto transmisión de 15 cuñas de 30 segundos de feb. 18 al 22/80 a \$16.00 c/u. 240.00

WUEL RADIO (Factura 1230)

Por concepto transmisión de 30 cuñas de 30 segundos en feb. 21 al 22/80. 180.00

WPRM-FM (Factura 0955)

Por concepto transmisión de 10 cuñas de 30 segundos de feb. 21 al 22/80. 180.00

Total Radio 2/23/80 \$ 3,905.00

PROMOCION RADIO MARATON 3/1/80

WKAQ RADIO (Factura 2471-03)

Por concepto transmisión de 20 cuñas de 30 segundos en Radio Reloj A1 en feb. 28 y 29/80 a \$61.00 c/u. 1,220.00

CADENA ULTIMA HORA (Factura 60)

Por concepto transmisión de 30 cuñas de 30 segundos en Noticiero Ultima Hora (WUHO) en feb. 28 y 29/80 a \$36.00 c/u. 360.00

Total Radio 3/1/80 1,580.00

Total Promoción Radio \$ 5,485.00

DE FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-7 P

DATE:

- 4 -

CADENA RADIO MARATON 2/23/80 POR LAS SIGUIENTES ESTACIONES

UNIO RADIO-RIO PIEDRAS (Fact. 73) 8 horas (incluye remoto)	\$ 2,800.00
UNIO-ARECIBO (Fact. 41694)	960.00
UNIO-AGUADILLA (Fact. 26-F)	800.00
ONZAP-POUCE (Fact. 02-9050)	2,200.00
TELEO-POUCE (Fact. 02-9078)	1,600.00
OTRA-MAYAGUEZ (Fact. 22470) 1 1/2 horas.	720.00
OTRA-MAYAGUEZ (Fact. 6224)	640.00
OTRA-MAYAGUEZ (Fact. 2-00-335)	700.00
OTRA-MAYAGUEZ (Fact. 4762)	300.00
OTRA-MAYAGUEZ (Fact. 31-511)	600.00
OTRA-SAN SEBASTIAN (Fact. 80-2-25) 4 1/2 horas.	460.00
OTRA-LUCILLO (Fact. 1045)	1,200.00
OTRA-CHAYAMA (Fact. F-74)	1,200.00
OTRA-CHAYAMA (Fact. 2-136-80)	1,200.00

Total Cadena 2/23/80

\$ 10,940.00

TOTAL

\$ 24,410.00

DE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-S P

COMITE AMIGOS DE JENNY CARTER

DATE: Marzo 20, 1980

TV & Radio Production
TV spots March 7-14/80

\$ 24,825.

PRODUCCION

TELEVICENTRO FILMS

Por concepto spot de TV, copias (3)
en video tape de 2 segundos de joven,
chica y grupo cantando en avenida "Soy
Demócrata".

\$ 3,150.00

MUSIC SOUND

Por concepto producción de jingle "Es
con Jimmy Carter" incluyendo músicos,
cantantes, licencia, arreglos musicales,
grabación en estudio y derechos de uso
para radio y TV.

2,950.00

TV

TELEVICENTRO FILMS

Por concepto de producción spot de TV de
30 segundos "Es con Jimmy Carter" incluyendo
talento, filmación, edición, locutor, grabación
en sonido y copias en VTR. (Chica cantando en
comité)

3,010.00

RADIO

SPOTS DE RADIO DE 30 SEGUNDOS SOBRE PRIMARIAS JIMMY CARTER

Por grabación en estudio de cuñas de 30
segundos, mixing, copias en tapes y en
cartridges para estaciones de radio inclu-
yendo spots "Primarias Demócratas" "Segunda
Fase Radio Maratón", spot con jingle "Soy
Demócrata" y "Caravana".

1,545.00

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-8 P

DATE:

- 2 -

Grabación de spot en inglés para uso
en estación WHOA.

\$ 270.00

Por pauta y 257 sound track tapes
(8-track) entregados a miembros del
Partido y al Comité (Jingle "Es con
Jimmy Carter")

2,640.00

HECTOR TRAVIESO

Por servicios como locutor en cuñas de
radio de 30 segundos campaña de Jimmy
Carter.

1,000.00

SPOT DE RADIO "A LA DERROTA"

Grabación de spot de 30 segundos con
27 cartridges edición y tapes.

530.00

RAUL ROSADO

Por concepto de locución en spot a 2
voces "A la derrota" y en Chappaquiddick.

200.00

TAIMO, INC.

Por concepto de producción adicional de
10,500 banderas Carter/Carter adicionales.

4,830.00

TV

WAPA TV

Por concepto de 3 cuñas de 30 segundos
transmitidas en Break 7:58 en marzo 7,
10,12, 1980 a \$370.00 c/u.

1,110.00

WKBH-TV CANAL 11

Por concepto de 6 cuñas de 30 segundos
transmitidas en Novela 9PM en marzo 7
al 14, 1980 a \$350.00 c/u.

2,100.00

DE FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-8 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 3 -

WKBN-TV CANAL 11

Por concepto de 3 cuñas de TV de 30 segundos en Break 8:01 en marzo 10, 12, 13, 14, 1980 a \$325.00 c/u.

\$ 1,300.00

SPOT DE RADIO SOBRE CHAPPAQUIDICK

Por grabación, edición y cartridges para pasar el 3 de marzo de 1980.

190.00

TOTAL

\$ 24,825.00

IRMA W. GOMEZ

3474043127

DE FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-10 P

COMITE AMIGOS DE JIMMY CARTER

DATE: Marzo 19, 1980

TV Campaign March 1980
Printing

CAMPANA DE TV
PROMOCION PRIMARIAS DEMOCRATAS

\$ 7,878.80

WAPA TV

Por concepto de 6 cuñas de TV de 30 segundos transmitidas en Don Chelito 12:45PM en marzo 5,6,7,12,13,14/80 a \$155.00 c/u.

\$ 930.00

WAPA TV

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Station Break 6:29 en marzo 4,5,7,10,11,12,14/80 a \$320.00 c/u.

2,240.00

WAPA TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Station Break 6:58 en marzo 7,8,14,15/80 a \$370.00 c/u.

1,480.00

WAPA TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Station Break 7:58 en marzo 6,8,9,13,15/80 a \$370.00 c/u.

1,850.00

WAPA TV

Por concepto de 7 cuñas de TV de 30 segundos transmitidas en Station Break 8:58 en marzo 5,12 a \$415.00 c/u y marzo 6,8,9,13,15/80 a \$385.00 c/u.

2,755.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Police Woman en marzo 4, 1980 a \$420.00.

420.00

WAPA TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Noticentro 6:00PM en marzo 11,13/80 a \$450.00 c/u.

1,800.00

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

INVOICE NO. 80-3-10

CONITE AMIGOS DE JIMMY CARTER

DATE:

- 2 -

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Fantasy Island en marzo 9, 1980 a \$620.00.

\$ 620.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Charlie's Angels en marzo 5, 12/80 a \$620.00 c/u.

1,240.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en UFO en marzo 12/80 a \$590.00.

590.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Barnaby Jones en marzo 5, 12 (2)/80 a \$390.00 c/u.

1,170.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Ay Bendito Que Pueblito en marzo 9/80 a \$475.00 c/u.

950.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Salvaje en marzo 13/80 a \$555.00.

555.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Eight is Enough en marzo 14/80 a \$500.00.

500.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitida en Rich Man.

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO: 86-3-10 P

CONITE AMIGOS DE JIMMY CARTER

DATE:

- 3 -

Poor Man en marzo 7,14(2)/80 a \$370.00 c/u. \$ 1,110.00

WAPA TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Gran Espectacular en marzo 6,13/80 a \$475.00 c/u.

950.00

WAPA TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en El Hombre Nuclear en marzo 7,14(2)/80 a \$420.00 c/u.

1,260.00

WAPA TV

Por concepto de 12 cuñas de TV de 30 segundos transmitidas en Noticentro 11PM en marzo 4,5,6,7,8,11,12,13(2),14,15(2)/80a \$300.00 c/u.

3,600.00

WAPA TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Disneylandia en marzo 15/80 a \$375.00.

375.00

Total WAPA TV \$ 24,395.00

WKAQ TV

Por concepto de 14 cuñas de TV de 30 segundos transmitidas en Telenoticias 10PM en marzo 4(2),5,6,7(2),10(2),11(2),12,13,14(2)/80 a \$325.00 c/u.

4,550.00

WKAQ TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Telenoticias 6PM en marzo 4,5,11,12/80 a \$375.00 c/u.

1,500.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Novela 7PM en marzo 14/80 a \$825.00.

825.00

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CONITE AMIGOS DE JIMMY CARTER

INVOICE NO. 89-3-10 P

DATE:

- 4 -

WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Lo Mejor de Hollywood en marzo 8,15(2)/80 a \$300.00 c/u. \$ 900.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Show de Nydia en marzo 9/80 a \$450.00. 450.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Retorno del Santo en marzo 9/80 a \$400.00. 400.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Little House en marzo 9/80 a \$350.00. 350.00

WKAQ TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Best Sellers en marzo 10/80 a \$450.00 c/u. 900.00

WKAQ TV

Por concepto de 4 cuñas de TV de 30 segundos transmitidas en Quest en marzo 4(2) y 11(2) a \$400.00 c/u. 1,600.00

WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Gran Película en marzo 7,14(2)/80 a \$450.00 c/u. 1,350.00

WKAQ TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Rockford Files en marzo 5(2),12(3)/80 a \$400.00 c/u. 2,000.00

DE FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico, 00907 / (809) 725-8445

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-10 P

DATE:

- 8 -

WKAQ TV

Por concepto de 3 cuñas de TV de 30 segundos transmitidas en Salsa Sábado en la Noche en marzo 8,15(2) a \$400.00 c/u. \$ 1,200.00

WKAQ TV

Por concepto de 2 cuñas de TV de 30 segundos transmitidas en Chapulín en marzo 6,13/80 a \$675.00 c/u. 1,350.00

WKAQ TV

Por concepto de 5 cuñas de TV de 30 segundos transmitidas en Hawaii 5-0 en marzo 6(2)/80 y marzo 13(3)/80 a \$400.00 c/u. 2,000.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitida en Gente Joven en marzo 15/80. 375.00

WKAQ TV

Por concepto de 1 cuña de TV de 30 segundos transmitidas en Muppet Show en marzo 15/80. 200.00

Total WKAQ TV \$ 19,950.00

WLUZ TV

Por concepto de 24 cuñas de TV de 30 segundos transmitidas en Buenas Noches en marzo 4 al 14/80 a \$80.00 c/u. 1,920.00

WKBN TV

Por concepto de 12 cuñas de TV de 30 segundos transmitidas en Noticias 10PM en marzo 4-7 y 10-14/80 a \$250.00 c/u. 3,000.00

TOTAL TV \$ 49,265.00

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

INVOICE NO. 80-3-10 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 6 -

IMPRESOS

TEMPO CREATIVE SERVICES (Fact. 80-3-64,56,14)

Por concepto de impresión y arte de 70,000 posters a dos colores de Jimmy Carter (Vota por el número 1) 11x17.

\$ 3,200.00

RAMALLO BROS (Fact. 10993)

Por concepto de impresión de 20,000 posters 12 1/2 x 20 "Carter" y 20,000 posters 16x 25 "Carter".

4,568.00

TEMPO CREATIVE SERVICES (Fact. 80-2-204 y 80-3-63)

Por concepto impresión de 32,500 fotos de Jimmy Carter con su firma.

1,007.50

TEMPO CREATIVE SERVICES (Fact. 80-3-4)

Por concepto impresión y arte de 55,000 posters 11x17 "Dale tu voto el 16 de marzo".

2,300.00

TEMPO CREATIVE SERVICES (Fact. 80-3-45)

Por concepto impresión de hojas sueltas

750.00

TEMPO CREATIVE SERVICES (Fact. cu-2-125)

Por concepto de impresión y arte de papel carta y 10,000 sobres de Comité Amigos de Jimmy Carter.

155.00

TEMPO CREATIVE SERVICES (Fact. 80-2-202)

Por concepto de arte para bumper stickers y arte de caricatura.

100.00

JOE FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-10 P

CONITE AMIGOS DE JIMMY CARTER

DATE:

- 7 -

TEMPO CREATIVE SERVICES (Fact. 80-3-67)

Por concepto de impresión de 50,000 tickets a dos colores "Respalda al Presidente Carter a usted le corresponde votar".

\$ 1,200.00

TEMPO CREATIVE SERVICES (Fact. 80-2-199)

Por concepto de impresión de posters para Campaña Promoción Radio Maratón 2/23/80.

1,700.00

TEMPO CREATIVE SERVICES (Fact. 80-3-70)

Por concepto de impresión de 20,000 tarjetas "Maratón Bailable"; 60,000 tarjetas "donativo" 1.00 y 200 tarjetas de identificación.

1,350.00

MULTI PLASTICS (Fact. 2797 y 2828)

Por concepto de 25,000 bumper stickers "Re-elige a Carter".

3,700.00

TAINO COLOR LAB. (Fact. 80/23 y 30)

Por concepto de 8,955 banderas "Carter, Carter" a .46¢.

4,119.30

MULTI PLASTICS (Fact. 2845)

Por concepto de 5,000 bumper stickers "Nadie se ahoga".

600.00

MULTI PLASTICS (Fact. 2854)

Por concepto de 4,000 calcomanías "Pres. de Colegio" y 4,000 "Jimmy Carter".

864.00

Total Impresos \$ 25,613.80

TOTAL \$ 74,878.80

YRMA L. GOMEZ

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 88-3-11 P

DATE: Marzo 28, 1988

Radio sports

RADIO

\$ 22,079.

PROMOCION CARAYANA 3-8-80

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj am en marzo
6,7/80 a \$61.00 c/u y 15 locales en marzo
8/80 a \$18.00 c/u.

\$ 880.00

PROMOCION PRIMARIAS DEMOCRATAS

WKAQ RADIO

Por concepto de 25 cuñas de 30 segundos
transmitidas en Radio Reloj am de marzo
10 al 14/80 a \$61.00 c/u.

1,525.00

CAMPANA JIMMY CARTER PRIMARIAS

WIAQ RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas en Noti Reloj de marzo 12
al 14/80 a \$18.00 c/u.

324.00

WUNO RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas en Noticiero Ultima Hora en
marzo 12 al 14/80 a \$36.00 c/u.

648.00

WQBS RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas localmente de marzo 12 al
15/80 a \$24.00 c/u.

480.00

WPPP RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 14/80 a \$7.00 c/u.

420.00

WHEL RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 15/80 a \$5.00 c/u.

300.00

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-11 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 2 -

NCMN RADIO

Por concepto de 60 cuñas de 30 segundos
transmitidas en marzo 12 al 15/80 a \$4.00 c/u. \$ 240.00

WNEL-CAGUAS

Por concepto de 60 cuñas de 30 segundos
transmitidas de marzo 12 al 15/80 a \$6.00 c/u. 360.00

MHOA-SAN JUAN

Por concepto de 52 cuñas de 30 segundos .
transmitidas de marzo 10 al 15/80 a
\$9.00 c/u. 468.00

WKVM RADIO

Por concepto de 18 cuñas de 30 segundos
transmitidas de marzo 12 al 14/80 a
\$24.00 c/u. 432.00

WKAQ RADIO

Por concepto de 90 cuñas de 30 segundos
transmitidas en marzo 14/80 en Radio Reloj
a \$61.00 c/u. 5,490.00

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo
15/80 a \$61.00 c/u. 610.00

WKAQ RADIO

Por concepto de 4 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo
16/80 a \$61.00 c/u. 244.00

TRANSMISION DE SPOT "A LA DERROTA"

JOE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-11

CONITE AMIGOS DE JIMMY CARTER

DATE:

- 3 -

WBOZ-SAN GERMAN

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$3.50 c/u. \$ 105.00

WNIA RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$1.70 c/u. 51.00

WKFE-YAUCO

Por concepto de 30 cuñas de 30 segundos.
Transmitidas en marzo 14,15/80 a \$4.50 c/u. 135.00

WABA-AGUADILLA

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$3.50 c/u. 105.00

WKJV-MAYAGUEZ

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$4.00 c/u. 120.00

WLEO-PONCE

Por concepto de 30 cuñas de 30 segundos
Transmitidas en marzo 14,15/80 a \$4.00 c/u. 120.00

WPRM-FM

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$18.00 c/u. 540.00

WBMJ-SAN JUAN

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$33.00 c/u. 990.00

WCNN-ARECIBO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 14 a \$4.00 c/u. 60.00

DE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-11 P

COMITE AMIGOS DE JIMMY CARTER

DATE:

- 4 -

WALO-HUNACAO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$5.00 c/u. \$ 75.00

WXRF-GUAYAMA

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$6.00 c/u. 90.00

WMDD-FAJARDO

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$8.00 c/u. 120.00

WKVM RADIO

Por concepto de 12 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$4.00 c/u. 288.00

WPRA-MAYAGUEZ

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80a \$4.00 c/u. 120.00

HKAQ-FM-105

Por concepto de 30 cuñas 30 segundos
transmitidas en marzo 14/80 a \$13.00 c/u. 390.00

WQ11-SAN JUAN

Por concepto de 15 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$45.00 c/u. 675.00

WQBS-SAN JUAN

Por concepto de 8 cuñas de 30 segundos
transmitidas en marzo 13,14/80 a \$30.00 c/u. 240.00

WAPA-SAN JUAN

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 13,14/80 a \$16.00 c/u. 160.00

WSOL-LUQUILLO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15/80 a \$2.50 c/u. 75.00

IDE. FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 88-3-11 P

COMITÉ AMIGOS DE JIMMY CARTER

DATE:

- 5 -

WUNA-AGUADILLA

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$3.60 c/u. \$ 108.00

WKAQ RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo 15
a \$61.00 c/u. 610.00

WKAQ RADIO

Por concepto de 4 cuñas de 30 segundos
transmitidas en Radio Reloj AM en marzo 16,
1980 a \$61.00 c/u. 244.00

WQBS RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$21.00 c/u. 630.00

WVJP-CAGUAS

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 a \$4.00 c/u. 120.00

WIAF RADIO-FM

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 durante el
día a \$12.00 c/u. 360.00

WIAF RADIO

Por concepto de 30 cuñas de 30 segundos
transmitidas en marzo 14,15, 1980 durante el
día a \$18.00 c/u. 540.00

PROGRAMA REMOTO EL 16 DE MARZO/80 DE 6-11 PM

WUNO RADIO

Por concepto de 5 horas de transmisión en marzo
16/80 durante el día. 1,750.00

DE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CONITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-3-11 P

DATE:

- 6 -

SPOTS DE RADIO PARA MAYOR PARTICIPACION EN LOS PROCESOS ELECTORALES

WUNO RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$15.00 c/u.

\$ 150.00

WKVM RADIO

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$20.00 c/u.

200.00

WKVM RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas en marzo 16/80 a \$13.00 c/u.

130.00

WAPA RADIO

Por concepto de 20 cuñas de 30 segundos
transmitidas en marzo 15,16/80 a \$12.00 c/u.

240.00

W1AC-FM

Por concepto de 10 cuñas de 30 segundos
transmitidas en marzo 15/80 a \$12.00 c/u.

120.00

TOTAL

\$ 22,079.00

IRMA H. GOMEZ

DE FRANCO & ASSOCIATES, Inc.

120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 88-3-12 P

COMITE AMIGOS DE JIMMY CARTER

DATE: Marzo 20, 1980

Press + press production

Balance \$ 2463.24

**PUBLICACION DE ANUNCIO SOBRE PROGRAMA ESPECIAL
DE TV EL 15 DE MARZO CON CARLOS ROMERO BARCELO
Y CHIP CARTER**

EL NUEVO DIA

Por concepto de 1 anuncio de 54 pulgadas
publicado en marzo 15, 1980. (Jimmy
Carter hacia otro triunfo)

\$ 918.00

TEMPO CREATIVE SERVICES, INC.

Por concepto de arte y 2 negativos
para anuncio de prensa publicado en
marzo 15, 1980.

353.00

ANUNCIO EN CADENA RADIAL EL DIA DE LAS PRIMARIAS

EL NUEVO DIA

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

510.00

EL MUNDO

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

510.00

THE SAN JUAN STAR

Por concepto de 1 anuncio de 30 pulgadas
publicado en marzo 15, 1980.

420.00

NATIONAL TYPESETTING SERVICES

Por concepto de tipografía para anuncio
de prensa publicado en El Nuevo Dia, El Mundo,
The San Juan Star en marzo 15, 1980.

225.00

TEMPO CREATIVE SERVICES, INC.

Por concepto de arte y 4 negativos para
anuncio de prensa.

176.00

TOTAL

\$ 2,912.00

IRMA M. GOMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:
COMITE AMIGOS DE JIMMY CARTER

INVOICE NO. 80-4-31 P

DATE: Mayo 13, 1980

Printing

\$203.

TEMPO CREATIVE SERVICES (Fact. 80-4-109)
Por concepto de arte final e impresión de
2,000 tarjetas de recordatorio de donaciones.

\$ 35.00

EXPRESS PRINTS (Fact. 8001977)
Por concepto de tickets numerados.

150.00

TEMPO CREATIVE SERVICES (Fact. 80-4-43)
Por concepto de impresión 2,000 notitas
("Favor de hacer cheque a nombre de...")

18.00

TOTAL

\$ 203.00

Irma M. Gomez
IRMA M. GOMEZ

8404040201

OPERATIONAL EXPENSES

Period: February 19, 1980 - March 16, 1980

Rental of real property, office equipment, and
vehicles. ----- \$3,432.35

Food, lodge and transportation for officers
and volunteers. ----- 2,581.78

Paint, hardware and cleaning materials related
to the refurbishing preparation and maintenance
of premises used as office space. ----- 4,986.73

Gasoline and maintenance cost for vehicles. ----- 1,728.46

Total ----- - \$12,729.32

84040432015



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

April 17, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico

Re: MUR 1354

Dear Mr. Jurado:

This is in response to your letter of April 8, 1981, in which you request an extension of time in which to respond to the Commission's Order of March 20, 1981.

Your request for an extension of 30 days in which to respond has been granted. Your response must be submitted no later than the close of business, May 15, 1981.

If you have any questions, contact Suzanne Callahan at (202) 523-4057.

Sincerely,

A handwritten signature in cursive script, appearing to read "Charles N. Steele", is written over the typed name.

Charles N. Steele
General Counsel

84040482016

84040482017

Callahan MUR 1354

Form 3811, Jan 1978

● **SENDER:** Complete sender's name and address. Add your address in the "RETURN TO" space on reverse.

1. The following service is requested (check one.)

☐ Show to whom 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:**

*Jurado
 Box 1512
 San Juan, PR 00934*

3. **ARTICLE DESCRIPTION:**

REGISTERED NO.	CERTIFIED NO.	INSURED NO.
	<i>949729</i>	

(Always obtain signature of addressee or agent)

I have received the article described above.

SIGNATURE ☐ Addressee ☒ Authorized agent

4. DATE OF DELIVERY

5. ADDRESS (Complete only if requested)

6. UNABLE TO DELIVER BECAUSE:

CLERK'S INITIALS

★ GPO : 1978-000-400

RETURN RECEIPT, REGISTERED, INSURED AND CERTIFIED MAIL

APR 31 1981

PR GPO WINDOW SERVICE

APR 31 1981

SAN JUAN, PR



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

MEMORANDUM TO: CHARLES STEELE *MW*
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
DATE: APRIL 13, 1981
SUBJECT: REFERRAL OF LETTER FROM ADALBERTO JURADO
REGARDING MUR 1354 (COMITE AMIGOS DE
JIMMY CARTER)

The attached letter was received in Chairman McGarry's office and then forwarded to the Commission Secretary's office. It is provided for your action.

ATTACHMENT:
Letter, dated April 8, 1981

1 APR 13 8 55:37

RECEIVED
FBI

84040482013

RECEIVED
OFFICE OF THE
COMMISSIONER81 APR 13 P4: 07
April 8, 1981

11 APR 13 P5: 37

GENERAL COUNCIL

Mr. John Warren McGarry
Chairman
Federal Election Commission
Washington, D. C. 20463

Dear Mr. McGarry:

Reference is made to your letter dated March 20, 1981, and received by me on April 1, in which you notify me that the Commission made a determination of reason to believe that "Comité Amigos de Jimmy Carter" supposedly infringed the following provisions of the Federal Elections Campaign Act: 434 (a) (4), 434 (b) (6) (iii) and 434(b) (8).

First of all, I would like to make clear that "Comité Amigos de Jimmy Carter" an unauthorized committee, was formed on February 19th, 1980 for the only purpose of supporting candidate Jimmy Carter in the March 16, 1980 Democratic Presidential Primary in Puerto Rico in view of the heavy spending campaign on behalf of Senator Edward Kennedy in Puerto Rico thru and independent Committee, as far as I have been informed.

It was the first time that my friends and myself took part in such process. I was not acquainted with the Federal Election Campaign Act nor its interpretation.

As you know, we the people of Puerto Rico are american citizens by birth, but do not have the right to vote for the President nor the Vice President of the United States under the present Commonwealth status.

So, the committee's work limited to fund-raising and campaigning only for the March 16, 1980 Presidential Primary for the selection of the delegates to the August National Democratic Convention.

8404048201?

The outcome of the March 16, 1980 Presidential Primary was 886,144 votes. President Carter got 21 delegates and Senator Kennedy 20 to the National Convention.

The independent committee "Amigos de Jimmy Carter" extinguished the same day the primary was held and it didn't participate in any further political activity because since we don't vote for the President, we don't have in Puerto Rico presidential campaign. We just campaign for the primary and that's all.

I made the reports according to the general information which I recieved in the blank forms provided by the Federal Election Commission, being the last one on April 30, 1980.

I never recieved a notarized ~~schedule~~ E blank form from the Commission to fill, if I had recieved such a form I would have filed it with the Commission.

"Amigos de Jimmy Carter" was an independent committee made up of volunteers only, just to help in President's campaign until the March 16, 1980 primary, without no economic interest nor any other purpose whatsoever.

The substantial part of the money raised came from the people's small contributions of nickels, dimes, quarters and one dollar bills in mass activities such as radio marathons, can collections in the streets, sales of refreshments and snacks and so forth.

This independent committee hired Joe Franco & Associates only for the primary campaign in relation to T.V., Radio, newspaper advertisements and so forth on a credit basis.

These expenses amounted to \$218,099.74 and when we finished all our activities on exactly the same day of the March 16, 1980 primary, we had an outstanding debt with Joe Franco & Associates for \$159,099.74.

From the primary on, "Amigos de Jimmy Carter" independent committee didn't make any other activity nor did raise any money at all.

I suppose that the democrats from Puerto Rico will individually help to pay for this outstanding debt to Joe Franco & Associates.

84040482020

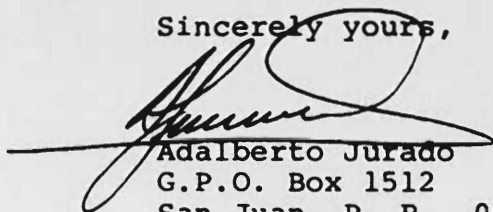
I, nor the independent committee have had no intention to violate any provision of the Federal Law so I shall comply with all the requirements of the Federal Election Commission.

I need more time to answer your questions and to gather all the information and documents as has been requested. Therefore, I request an extension of at least 30 days to put everything up to date according to your letter dated March 20, 1981.

For your information the committee closed operations by March 16, 1980 primary.

Hoping this letter will give you an idea of what this independent committee was and what it did, and expecting that you'll grant me the extension requested to comply with your inquiries, I remain

Sincerely yours,

A handwritten signature in dark ink, appearing to read 'Adalberto Jurado', is written over a horizontal line. The signature is stylized with a large loop at the end.

Adalberto Jurado
G.P.O. Box 1512
San Juan, P. R. 00936

84040482021

ITT World Communication

100123

RECEIVED

CX#
4459

ZCZC AWA500 VIA ITT PJA294 PGA0970041

UIWA CO PDSJ 063

81 APR 10 P 1: 02

SANJUANPR 063/064 07 1731 RCL

71 APR -7 17:46

FEDERAL ELECTION COMMISSION

WASHINGTON DC 20463

CONFIRM OF CABLEGRAM
TELEPHONED

ATTENTION MR JOHN WARREN MCGARRY
CHAIRMAN

RE : MUR 1354

WE ARE SENDING BY MAIL AN EXPLANATORY WRITTEN REQUEST
OF A PERIOD EXTENSION OF AT LEAST THIRTY (30) DAYS TO
SUBMIT THE INFORMATION REQUESTED IN YOUR LETTER OF MARCH
20, 1981 AND WHICH WE RECEIVED IN APRIL 1, 1981

ADALBERTO JURADO

TREASURER (FORMER) --COMITE AMIGOS DE JIMMY CARTER--

81 APR 10 P 1: 45

60

=COL 20463 1354 (30) 1981 1 1981

840404820222



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

March 20, 1981

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

Re: MUR 1354

Dear Mr. Jurado:

On March 19, 1981, the Federal Election Commission determined that there is reason to believe that the Comité Amigos De Jimmy Carter violated §§ 434(a)(4), 434(b)(6)(B)(iii) and § 434(b)(8) of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed order.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this order.

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

84040482023

8440482024

Sincerely,

Enclosures

CALLAHAN MR1351

RECEIVED: Chapter 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. ARTICLES ADDRESSED TO:

Alberto Juarez

3. ARTICLE DESCRIPTION

REGISTERED NO.	CERTIFIED NO.	INSURANCE
	<i>115646</i>	

(Always obtain signature of addressee if required)

I have received the article described above.

SIGNATURE *[Signature]* Certified agent

4. DATE OF DELIVERY

5. ADDRESS REASON only if insured

6. UNABLE TO DELIVER BECAUSE

U.S. POSTAL SERVICE
JAN 10 1961
USPO

*U.S. 1-534-000-000

FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE March 20, 1981

MUR NO. 1354
STAFF MEMBER & TEL. NO.

RESPONDENT Comite Amigos De
Jimmy Carter

Suzanne Callahan

(202) 523-4057

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

SUMMARY OF ALLEGATIONS

On January 28, 1981, the Reports Analysis Division (RAD) referred to the Office of General Counsel, the Comite Amigos De Jimmy Carter ("The Committee") in connection with its failure to file reports of receipts and expenditures in violation of 2 U.S.C. §434a(4).

FACTUAL BASIS AND LEGAL ANALYSIS

ANALYSIS

The Committee registered as an unauthorized committee supporting the candidacy of Jimmy Carter of March 6, 1980. Subsequent to its registration, the Committee filed one report covering March 1 through April 30, 1980.

The report indicates that as of April 30th, the Committee had contracted with Joe Franco & Associates, Inc. for a total of \$218,099.74 in media services, presumably on behalf of President Carter's re-election campaign. Of that amount, \$59,000 has been paid by the Committee and the remaining \$159,099.74 is reported as an outstanding debt. Additionally, the committee reports making \$12,729.32 in independent expenditures.

The Committee was sent non-filer notices in connection with its failure to file the July 15th, October 15th, 12 day pre-general election and 30 day post general election reports on July 22nd, October 22nd, October 29, 1980 and January 23, 1981, respectively. The Committee failed to respond to any of the notices.

Additionally, the committee has failed to file the year end report in violation of §434(a)(4).

While the Committee's detailed Summary Schedule filed with the April 15, 1980 report discloses \$12,729.32 for independent expenditures, it failed to file a corresponding notarized schedule E reporting the particulars of its independent activity in violation of 2 U.S.C. §434(b)(6)(B)(iii).

84040482025

The Committee has also failed to disclose the status of its outstanding debt of \$159,099.74 owed to Joe Franco & Associates in violation of 2 U.S.C. §434(b) (8).

Therefore, the General Counsel recommends that the Commission find reason to believe that respondent has violated 2 U.S.C. §§434(a) (4), 434(b) (6) (B) (iii), and 434(b) (8)

RECOMMENDATIONS:

It is recommended that the Commission:

1. Find reason to believe the Committee violated 2 U.S.C. §434(a) (4);
2. Find reason to believe the Committee violated 2 U.S.C. §434(b) (6) (B) (iii); and
3. Find reason to believe the Committee violated 2 U.S.C. §434(b) (8).

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884040482027

Comite Amigos De
Jimmy Carter

MUR 1354

TO: Adalberto Jurado, Treasurer
Comite Amigos De Jimmy Carter
GPO Box 1512
San Juan, Puerto Rico 00936

Pursuant to 2 U.S.C. §437d(a) (1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission
has hereunto set his hand in Washington, D.C. on this 20th day
of March, 1981.

John Warren McGarry
John Warren McGarry
Chairman

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

Attachment(s)
Excerpt from Committee Report (1 page)
Questions (1 page)

ATTACHMENT TO ORDER TO ANSWER QUESTIONS

The April 10, 1980 report of receipts and expenditures filed by the Committee Amigos de Jimmy Carter (The Committee) (detailed summary page attached for your reference) indicates that your committee made \$12,729.32 in independent expenditures during the period March 1 through April 30, 1980.

1. Please submit an itemization of the above referenced independent expenditures as required by 2 U.S.C. §434.

The April 10, 1980 report of receipts and expenditures list a \$59,000 payment to Joe Franco & Associates, Inc. by the Committee and an outstanding debt of \$159,099.74 owed to Joe Franco & Associates, Inc. for TV and Radio advertisements.

2. Please submit a detailed statement as to the current obligation owed to Joe Franco by the Committee and an itemization of the services provided to the Committee by Joe Franco.
3. Please submit a detailed explanation as to the differentiation between the \$12,729 in independent expenditures made by the Committee and the \$218,100 in contracted services for media advertisements with Joe Franco & Associates, Inc.
4. Did the Committee ever seek authorization from Mr. Carter or any of his agents to receive contributions or make expenditures on his behalf?
5. Identify the organizers, officers, members and personnel of the Committee. Were any of these individuals involved in prior campaign activity on behalf of Mr. Carter? If so, please identify who was so engaged, in what capacity, and on what dates.
6. Did you or any other Committee officers or members discuss or correspond with Mr. Carter or any of his authorized agents regarding his campaign activities? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.
7. Did Mr. Carter or any of his authorized agents offer any suggestions in regard to the Committee's activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.
8. With regard to Committee solicitations, please describe or respond to the following:
 - a. How were the solicitations conducted?
 - b. In what manner were the contributions received?
 - c. Please attach a copy of any solicitation materials utilized by the Committee.
9. In your response state the source of Committee funds and provide the Commission with a list of the Committee's contributions including contributions from individuals as well as other committees.

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DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

RECEIVED

JUN 13 PM 1

Name of Committee (or Ballot)		Period Covering the Period	
AMIGOS DE Jimmy CARTER		From MARCH 1 to APRIL 30/80	
		COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS			
11 CONTRIBUTIONS (other than cash) FROM			
a1 Individuals/Persons Other Than Political Committees			
(Memo Entry Underlined)		72,082.04	
a2 Political Party Committees			
a3 Other Political Committees			
c TOTAL CONTRIBUTIONS (other than cash) add 11a, 11b and 11c:		72,082.04	
12 TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES			
13 ALL LOANS RECEIVED			
14 LOAN REPAYMENTS RECEIVED			
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Reimburse, etc.)			
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
17 OTHER RECEIPTS (Donations, Interest, etc.)			
18 TOTAL RECEIPTS (add 12, 13, 14, 15, 16 and 17):		72,082.04	
II. DISBURSEMENTS			
19 OPERATING EXPENDITURES			
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES		218,099.74	
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES			
22 INDEPENDENT EXPENDITURES (see Schedule E)		12,729.32	
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (see Schedule F)			
24 LOAN REPAYMENTS MADE			
25 LOANS MADE			
26 REFUNDS OF CONTRIBUTIONS TO			
a Individuals/Persons Other Than Political Committees			
b Political Party Committees			
c Other Political Committees			
d TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)			
27 OTHER DISBURSEMENTS			
28 TOTAL DISBURSEMENTS (add 19, 20, 21, 22, 23, 24, 25, 26d and 27)			
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES			
29 TOTAL CONTRIBUTIONS (other than cash) net of 11a, 11b and 11c:		72,082.04	
30 TOTAL CONTRIBUTIONS (including cash) net of 11a, 11b and 11c:		72,082.04	
31 NET CONTRIBUTIONS (other than cash) (subtract 28 from 29)			
32 TOTAL OPERATING EXPENDITURES net of 11a, 11b and 11c:		230,829.06	
33 OFFSETS TO OPERATING EXPENDITURES net of 11a, 11b and 11c:		159,099.74	
34 NET OPERATING EXPENDITURES (subtract 33 from 32)			

9

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111337



FEDERAL ELECTION COMMISSION

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

TO: CHARLES N. STEELE *mwe*
FROM: MARJORIE W. EMMONS/JODY CUSTER *jc*
DATE: MARCH 20, 1981
SUBJECT: MUR 1354 - Order

Attached is the order regarding MUR 1354,
approved by a vote of 5-0, which has been signed
and sealed this date.

34040482030

Attachment: Order - Jurado

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of
Comite Amigos de
Jimmy Carter

)
)
)
)

MUR 1354

CERTIFICATION

I, Marjorie W. Emmons, Secretary of the Federal Election Commission, do hereby certify that on March 19, 1981, the Commission decided by a vote of 5-0 to take the following actions regarding MUR 1354:

1. Find reason to believe the Committee violated 2 U.S.C. §434(a)(4).
2. Find reason to believe the Committee violated 2 U.S.C. §434(b)(6)(B)(iii).
3. Find reason to believe the Committee violated 2 U.S.C. §434(b)(8).
4. Approve attached order.
5. Send attached notification letter.

Commissioners Harris, McGarry, Reiche, Thomson and Tiernan voted affirmatively in this matter.

Attest:

3/19/81
Date

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

Received in Office of Commission Secretary:
Circulated on 48 hour vote basis:

3-16-81, 4:53
3-17-81, 11:00

84040482031

March 16, 1981

MEMORANDUM TO: Marjorie W. Emmons

FROM: Elissa T. Garr

SUBJECT: MUR 1354

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

Attachment

pak

cc: Callahan

34040482032

FIRST GENERAL COUNSEL'S REPORT

DATE AND TIME OF TRANSMITTAL
BY OGC TO THE COMMISSION 3-16-81

MUR # 1354
STAFF MEMBER(S) Callahan

81 MAR 16 P

81 MAR 16 P 4:53

WILSON SECRETARY

SOURCE OF MUR: INTERNALLY GENERATED

RESPONDENT'S NAME: Comite Amigos de Jimmy Carter

RELEVANT STATUTE: 2 U.S.C. §434, §441a §441b.

INTERNAL REPORTS CHECKED: Respondent's Reports of Receipts and Expenditures

FEDERAL AGENCIES CHECKED: None

GENERATION OF MATTER

On January 28, 1981, the Reports Analysis Division (RAD) referred to the Office of General Counsel, the Comite Amigos De Jimmy Carter ("the Committee") in connection with its failure to file reports of receipts and expenditures in violation of 2 U.S.C. §434a(4).

ANALYSIS OF ALLEGATIONS

The Committee registered as an unauthorized committee supporting the candidacy of Jimmy Carter on March 6, 1980. Subsequent to its registration, the Committee filed one report covering March 1 through April 30, 1980.

The report indicates that as of April 30th, the Committee had contracted with Joe Franco & Associates, Inc. for a total of \$218,099.74 in media services, presumably on behalf of President Carter's re-election campaign. Of that amount, \$59,000 had been paid by the committee and the remaining balance of \$159,099.74 is reported as an outstanding debt. Additionally, the committee reports making \$12,729.32 in independent expenditures.

The Committee was sent non-filer notices in connection with its failure to file the July 15th, October 15th, 12 day pre-general election and 30 day post general election reports on July 22nd, October 22nd, October 29, 1980 and January 23, 1981, respectively. The Committee failed to respond to any of the notices.

Additionally, the committee has failed to file the year end report in violation of §434(a)(4).

33
203
48
40
40
34

While the Committee's detailed Summary Schedule filed with the April 15, 1980 report discloses \$12,729.32 for independent expenditures, it failed to file a corresponding notarized schedule E reporting the particulars of its independent activity in violation of 2 U.S.C. §434(b)(6)(B)(iii).

The committee has also failed to disclose the status of its outstanding debt of \$159,099.74 owed to Joe Franco & Associates in violation of 2 U.S.C. §434(b)(8).

The Committee's April 10 report which separately lists its independent expenditures and its media payments to Joe Franco & Associates raises a question as to whether those media expenses were coordinated with the Carter campaign. This issue is raised because the committee did not characterize the Joe Franco expenditures as independent on the subject report. If those expenditures were coordinated with the Carter campaign, they would be considered in-kind contributions from an unauthorized committee subject to the limitations of §441a.

It is recommended that at this time, the Commission find reason to believe that the Committee has violated 2 U.S.C. §434(a)(4), §434(b)(6)(B)(iii) and §434(b)(8). In order to ascertain whether the media expenditures at issue were independent of the Carter Campaign and to determine whether Joe Franco & Associates has extended credit beyond the normal course of business, it is recommended that the attached order to answer questions be sent to the treasurer of the committee. Upon receipt of the requested information, further recommendations concerning the possible §441a violation will be made to the Commission.

RECOMMENDATIONS

It is recommended that the Commission:

1. Find reason to believe the Committee violated 2 U.S.C. §434(a)(4);
2. Find reason to believe the Committee violated 2 U.S.C. §434(b)(6)(B)(iii);
3. Find reason to believe the Committee violated 2 U.S.C. §434(b)(8);
4. Approve attached order; and
5. Send attached notification letter.

ATTACHMENTS

RAD Referral
Proposed Order
Proposed Notification Letter
Authorization Form
(24 total pages)

404048203
REPORTS ANALYSIS REFERRAL SHEET

DATE JANUARY 28, 1981 ANALYST Michael Filler
TO: OFFICE OF GENERAL COUNSEL TEAM CHIEF Irene Allen
THROUGH: STAFF DIRECTOR PS COMPLIANCE REVIEW PS
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS PS

CANDIDATE/COMMITTEE: COMITE AMIGOS DE JIMMY CARTER (C99002214)
TREASURER: Adalberto Jurado
ADDRESS: G.P.O. Box 1512
San Juan, Puerto Rico 00936
AFFILIATE(S): NONE

ALLEGATION(S): Failure to file reports of receipts and expenditures CITE: 2 U.S.C. 434a(4) ATTACHMENT(S) 1

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

- ☐ Normal Review ☒ Other: Request by Office of General Counsel

ATTACHMENT

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

PERIOD COVERED FROM March 1, 1980 TO April 30, 1980

TOTAL RECEIPTS \$ 72,082.04 TOTAL EXPENDITURES \$ 71,839.32

CASH ON HAND \$ 352.72 DEBTS \$ TO:-0- BY: \$159,099.74

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Non-filer notices. See Page Two.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

None

REASON(S) FOR REFERRAL:

ATTACHMENT

Violation of Review and Non-Compliance Referral Standard - #1: failure to respond to first notification of non-filing within 20 days, and the financial activity of the committee exceeds \$50,000 in receipts or disbursements.

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

Failure to file 30 Day Post-General Election Report.
Notice sent on January 23, 1981.

8

OTHER RELEVANT INFORMATION:

ATTACHMENT

See Page Two.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

REPORTS ANALYSIS REFERRAL SHEET

PAGE TWO

COMITE AMIGOS DE JIMMY CARTER

ATTACHMENT

RESULTS OF REVIEW:

Failure to file 1980 July 15 Report. Notice sent on July 22, 1980.	5
Failure to file 1980 October 15 Report. Notice sent on October 22, 1980.	6
Failure to file 1980 12 Day Pre-General Election Report. Notice sent on October 29, 1980.	7

OTHER RELEVANT INFORMATION:

Line 22 of the Detailed Summary Schedule discloses \$12,729.32 for independent expenditures, however a notarized Schedule E has not been provided.	4
--	---

Schedule B discloses a \$59,000 payment to Joe Franco & Associates for radio and television advertisements. If the disbursement was an independent expenditure in support of Jimmy Carter, the transaction should have been disclosed on a notarized Schedule E.	4
--	---

The committee has failed to disclose the status of \$159,099.74 in outstanding obligations owed to Joe Franco & Associates for radio and television advertisements.	4
---	---

The committee has failed to disclose the source of its initial cash on hand of \$100.	4
---	---

There are mathematical discrepancies between disbursement figures on the Detailed Summary Schedule and the total disbursement figure disclosed on the Summary Schedule.	4
---	---

The committee's original and amended Statements of Organization note that it is a single candidate uauthorized committee supporting Jimmy Carter.	2 & 3
---	-------

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2

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (77-80)
 8 4 0 4 0 9 8 2 0 3 7
 INDEPENDENT EXPENDITORS

DATE 22JAN81
 PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COMITE' AMIGOS DE JIMMY CARTER								INDEPENDENT EXPENDITURE ID 0C9900221
	1980 STATEMENT OF ORGANIZATION					28FEB80	4	80FEC/100/50
	STATEMENT OF ORGANIZATION - AMENDMENT					13JUN80	3	80FEC/110/38
	APRIL QUARTERLY		72,082			71,839 1MAR80 -30APR80	4	80FEC/110/38
	TOTAL	0	72,082	0		71,839	13	TOTAL PAGES

Attachment #1

ATTACHMENT #2

PEC Form 1
July 1976
Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20543

Statement of Organization For a Political Committee

Supporting any candidate for federal office and aggregating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

Class: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (in full) <input type="checkbox"/> Check if name or address is changed Comité Amigos de Jimmy Carter		2 Identification Number
1(b) Address (number and street) Ponce de León 1902, 2do. Piso 1(c) City, State and ZIP code Santurce, Puerto Rico 00909		3 Date February 19, 1980 4 Is this an amended statement? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" fill in ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one

☐ 1(a) This committee has been designated as the principal campaign committee for _____ (Name of Candidate)
a candidate for _____ in the _____ (Election)
(Federal office sought) (Year of election)
to be held in the State of _____
(State in which election is held)
(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ 1(b) This committee is supporting only one candidate and is authorized by _____ (Name of Candidate)
to receive contributions and make expenditures with respect to the _____ (Candidate)
(General Primary Runoff, etc.)
held in _____, and will file all reports and statements with the candidate's principal campaign committee.
(Year of election - State)
(If name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (PEC FORM 2a)

☒ 1(c) This committee supports only one candidate, **Jimmy Carter**, but is not an authorized committee.
(Name of Candidate)

☐ 1(d) This committee supports more than one Federal candidate and is not a party committee.

☐ 1(e) This committee is a _____ committee of the _____ Party.
(National, State, County, City) (Democratic, Republican, etc.)

6 Name of affiliated and/or connected organization	Mailing address and ZIP code	Relationship
NONE		

If the registering political committee has identified a "connected organization" above, please indicate type of organization:
☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
☐ Corporation without capital stock ☐ Other (please state type)

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

4

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84040432003

PSC Form 1
July 1976
Federal Election Commission
1205 K Street, N.W.
Washington, D.C. 20545

Statement of Organization For a Committee

(Page 2)

Name of Committee Comité Amigos de Jimmy Carter			
7 Area, Scope and Jurisdiction of Committee: (a) Will this committee operate in more than one State? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (b) Will it operate on a statewide basis in one State? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No (c) Will it primarily support candidates making three or four office? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No (d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No			
8 (a) List by name, address, office sought, and party affiliation, any candidate for Federal office that this committee is supporting:			
Full name of candidate	Mailing address and ZIP code	Office sought	Party
Jimmy Carter	White House Washington, D.C.	President	Democratic Party
8 (b) List by name, address, office sought, and party affiliation, any candidate for any other public official that this committee is supporting unless the committee is supporting the entire ticket of a party as indicated in line 9:			
Full name of candidate	Mailing address and ZIP code	Office sought	Party
NONE			
9 If the committee is supporting the entire ticket of a party, give name of party: Dem			
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	
Adalberto Jurado	G.P.O. Box 1512 San Juan, P.R. 00936	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).			

5

Statement of Organization For a Committee

(Page 3)

Name of Committee			
Comité Amigos de Jimmy Carter			
11 List by name, address and position, other principal officers of the committee (include chairman, secretary, assistant chairman, district secretary, members of Finance Committee).			
Full name	Mailing address and ZIP code	Title or position	
Manuel M. Pérez Rodríguez	403 del Parque, Suite 1001 Santurce, P.R. 00912	President	
Adalberto Jurado	G.P.O. Box 1512, San Juan, P.R. 00936	Treasurer	
Julio Juan García	Ashford 1485, Santurce, Puerto Rico 00907	Vice-President	
Antonio Alfonso	Calle Lila Núm. 1687 Urb. San Francisco, Río Piedras, P.R. 00927	Secretary	
12 Does the committee plan to stay in existence beyond the current calendar year? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "Yes" for how long?			
13 In the event of dissolution, what disposition will be made of residual funds? <u>New Democratic Party of Puerto Rico</u>			
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		
Banco de Santander de Puerto Rico Account #001-026229	Recinto Sur Núm. 251, San Juan, P.R. 00901		
15 List all election reports required to be filed by this committee with State 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 438(a)).			
Report title	Date required	Name and position of recipient	Mailing address and ZIP code
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 sheets.			
I certify that I have examined this statement and to the best of my knowledge and belief it is true, correct and complete.			
			2/19/80 (Date)
Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441 (see instructions).			
For further information contact:		Federal Election Commission 1325 K Street, N.W. Washington, D.C. 20463	

6

STATEMENT OF ORGANIZATION

JUN 13 1981

1. Name of Committee: AMIGOS DE JIMMY CARTER Date: APRIL 30, 1981
 2. Address: 1902 PONCE DE LEON AVE. STOP 26
SAN JUAN, PUERTO RICO 00909

3. Name of Candidate: JIMMY CARTER Party: DEMOCRATIC PARTY State: P.R.
 4. Name of Candidate: JIMMY CARTER Party: DEMOCRATIC PARTY State: P.R.

5. Name of Candidate: JIMMY CARTER Party: DEMOCRATIC PARTY State: P.R.
 6. Name of Candidate: JIMMY CARTER Party: DEMOCRATIC PARTY State: P.R.

7. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____
 8. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

9. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____
 10. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

11. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

12. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

13. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

14. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

15. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

16. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

17. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

18. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

19. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

20. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

21. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

22. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

23. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

24. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

25. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

26. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

27. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

28. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

29. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

30. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

31. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

32. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

33. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____

M

VED

JUN 13 PM 1.

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee
(Summary Page)

1. Name of Committee in Full:

4. TYPE OF REPORT: check appropriate boxes.

AMIGOS DE JIMMY CARTER

Address (Number and Street):

G.P.O. Box 1512

City, State and ZIP Code:

SAN JUAN, P. R. 00936

2. Check if address is different than previously reported.

2. FEC Identification Number:

3. Is this committee qualified as a multicandidate committee during this Reporting Period on _____ date?

(a) ☒ April 15 Quarterly Report☐ July 15 Quarterly Report☐ October 15 Quarterly Report☐ January 31 Year End Report☐ July 31 Mid Year Report (Non-election Year Only)☐ Monthly Report for _____☐ Twelfth day report preceding _____
election on _____ in the State of _____☐ Thirtieth day report following the General Election
on _____ in the State of _____☐ Termination Reportb. Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY

5. Covering Period MARCH 1 Through APRIL 30Column A
This PeriodColumn B
Calendar Year-to-Date

6. (a) Cash on Hand January 1, 19____

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts from Line 18:

(d) Subtotal: add lines 6(a) and 6(b) for Column A and
lines 6(a) and 6(b) for Column B.

7. Total Disbursements from Line 23:

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee
(itemize on Schedule C or Schedule D)10. Debts and Obligations Owed BY the Committee
(itemize on Schedule C or Schedule D)I certify that I have examined this Report and to the best of my knowledge and belief
it is true, correct and complete.

For further information, contact:

Federal Election Commission
P.O. Box 300406-9800
Wash. D.C. 20040-0698ADALBERTO JURADO

Title of Print Name: Treasurer

SIGNATURE OF TREASURER

NOTE: Submission of this statement or incomplete information may subject the person or persons responsible to the penalties and civil sanctions provided in the Federal Election Campaign Act of 1971, as amended.

All previous versions of FED FORM 2 and FED FORM 2a are obsolete and should not be used.

FED FORM 2a, 1977

8

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

RECEIVED

JUN 13 PM 1

Name of Committee or Fund

AMIGOS OF JIMMY CARTER

Period Covering the Period

From MARCH 1 to APRIL 30/80

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11 CONTRIBUTIONS (other than loans) FROM:		
a. Individuals/Persons Other Than Political Committees		
(Making Entry Unnecessary) <u>72,082.04</u>		
b. Political Party Committees		
c. Other Political Committees		
d. TOTAL CONTRIBUTIONS (other than loans) (11a, 11b and 11c)	<u>72,082.04</u>	
12 TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES		
13 ALL LOANS RECEIVED		
14 LOAN REPAYMENTS RECEIVED		
15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Reports, etc.)		
16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17 OTHER RECEIPTS (Donations, Interest, etc.)		
18 TOTAL RECEIPTS (Add 11a, 12, 13, 14, 15, 16 and 17)	<u>72,082.04</u>	
II. DISBURSEMENTS		
19 OPERATING EXPENDITURES	<u>218,099.74</u>	
20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES		
21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22 INDEPENDENT EXPENDITURES (See Schedule E)	<u>12,729.32</u>	
23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (See Schedule E)		
24 LOAN REPAYMENTS MADE		
25 LOANS MADE		
26 REFUNDS OF CONTRIBUTIONS TO:		
a. Individuals/Persons Other Than Political Committees		
b. Political Party Committees		
c. Other Political Committees		
d. TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27 OTHER DISBURSEMENTS		
28 TOTAL DISBURSEMENTS (Add 19, 20, 21, 22, 23, 24, 25, 26d and 27)		
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29 TOTAL CONTRIBUTIONS (other than loans) (11d)	<u>72,082.04</u>	
30 TOTAL CONTRIBUTION REFUNDS (26d)	<u>72,082.04</u>	
31 NET CONTRIBUTIONS (other than loans) (11d minus 26d)		
32 TOTAL OPERATING EXPENDITURES (19)	<u>218,099.74</u>	
33 OPERATING EXPENDITURES (19 minus 20, 21, 22, 23, 24, 25, 26d and 27)	<u>159,099.74</u>	
34 NET OPERATING EXPENDITURES (19 minus 20, 21, 22, 23, 24, 25, 26d and 27)		

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SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
LINE NUMBER
Use separate sheets for each
category of the categories
Summary Page

Any information received from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions for or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee in Full
AMIGOS DE JIMMY CARTER

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JOE FRANCO & ASSOC. INC. - 1120 ASHFORD AVE. CONDADO/SANTUEN P.R. 00907	ADV. RADIO & T.V. - Disbursement for <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/4/80	\$59,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL (Sum of all disbursements This Period) \$			
TOTAL (Sum of all disbursements This Period) \$			

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DEBTS AND OBLIGATIONS Excluding Loans

Page ____ of ____ of
LINE NUMBER ____
THE ABOVE INFORMATION
IS FOR YOUR INFORMATION

Name of Committee in Full	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
AMIGOS DE JIMMY CARTER				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
JOE FRANCO & ASSOCIATES INC				
1120 ASHFORD AVE				
CONDADO/SAN JUAN, PR. 00907	28,091.74			59,000.00 159,192.74
Nature of Debt (Purpose):				
ADVERTISEMENT {T.V. RADIO}				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
G. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
H. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
I. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
J. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
K. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
L. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
M. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
N. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
O. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
P. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
Q. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
R. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
S. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
T. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
U. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
V. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
W. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
X. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				
Y. Full Name, Mailing Address and Zip Code of Debtor or Creditor:				
Nature of Debt (Purpose):				

ITEMIZED RECEIPTS

Page 1 of 1
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 identify of the various
 Summary Page.

4-11-2-7-88

BRIGOS DE JIMMY CARTER

10. 10. 10.

Page 6 of 10

\$100.00

Answer: Yes.

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James T. Brown

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5-3-54. 11:45 AM. 11:45 AM. 11:45 AM.

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SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 4
 THIS RECEIPT IS NOT VALID UNLESS SIGNED BY THE ISSUING OFFICE OF THE COMMISSION
 SUMMARY PAGE

Any information copied from other Reports or Statements may not be used or used by any person for the purpose of obtaining credit or for any other commercial purpose. Information is to be given and received only by the person named in the receipt and is not to be used for any other purpose.

Name of the person to be paid: **AMIGOS DE JIMMY CARTER**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (This Period)
ZAIDA RODRIGUEZ RODRIGUEZ 028 URS. TORREMOYUNOS GUAYNABO, P.R. 00657		3/31/80	\$50.00
Receipt for: <input checked="" type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation: 3/31/80	
Aggregate Year-to-Date-S			
RAY K. & MAULDAK. WOOD GEORGIA, U.S.A.			\$100.00
Receipt for: <input checked="" type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation:	
Aggregate Year-to-Date-S			
RAMIRO RAMIREZ SAN JUAN, P.R. -			\$100.00
Receipt for: <input checked="" type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation:	
Aggregate Year-to-Date-S			
SAMANTHA FASHIONS BOX 1271 OLD SAN JUAN 00902			\$50.00
Receipt for: <input checked="" type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation:	
Aggregate Year-to-Date-S			
MONSITA MOREYDA DEBAULA BOX 1271 OLD SAN JUAN 00902			\$50.00
Receipt for: <input checked="" type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation:	
Aggregate Year-to-Date-S			
MC. J. GEORGE TORO BOX 8845 SANTURCE PUEZ TUCOS STA. P.R. 00910			\$100.00
Receipt for: <input checked="" type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation:	
Aggregate Year-to-Date-S			
AMIGOS JUNIOR GRUZ GUAYNABO, P.R. 00657			\$100.00
Receipt for: <input checked="" type="checkbox"/> Salary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):		Occupation:	
Aggregate Year-to-Date-S			
SUBTOTAL: Receipts This Period: \$500.00			
TOTAL: This Period: \$500.00			

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1980

Comite' Amigos De Jimmy Carter
Adalberto Jurado
1902 Ponce De Leon Ave./Stop 26
San Juan, Puerto Rico 00909

Dear Mr. Jorado:

Your Campaign Finance Report for the period from April 1, 1980 (or from the date of registration) to June 30, 1980, required by the Federal Election Campaign Act, has not been received.

For the purpose of timely public disclosure, it is important that your report be available for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 (or with the Clerk of the House or Secretary of the Senate, as appropriate). A copy of your report, or the relevant portions of your report, should also be filed with the Secretary of State, or equivalent State Officer of the appropriate State(s). (11 CFR 108.2, 108.3, 108.4).

If you have filed the complete report (including all appropriate schedules) timely by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

Failure to file the complete report may result in audit or legal enforcement action.

If you have any questions regarding your filing requirements, please contact the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 22, 1980

Comite' Amigos De Jimmy Carter
Adalberto Jurado, Treasurer
1902 Ponce DeLeon Ave. Stop 26
San Juan, Puerto Rico 00909

Your October 15 Quarterly campaign finance report, required by the Federal Election Campaign Act, has not been received. This report must cover the period from July 1, 1980 (or from the date of registration or the closing date of your last report, whichever is later) through September 30, 1980.

It is important for your report to be available on a timely basis for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of your report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (11 CFR 108.3, 108.4).

If your report has been timely filed together with appropriate schedules) timely by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

The failure to file the complete report in a timely manner may result in publication, legal enforcement or audit action.

If you have any questions regarding this matter, please contact the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)523-4172.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 29, 1980

Comite Amigos de Jimmy Carter
Adalberto Jurado
1902 Ponce de Leon Avenue/Stop 26
San Juan
Puerto Rico

Dear Mr. Jurado:

Your 12 Day Pre-General Election campaign finance report, required by the Federal Election Campaign Act, has not been received. This report must cover the period from October 1, 1980 (or from the date of registration or the closing date of your last report, whichever is later) through October 15, 1980.

If you file on a monthly basis, you must file the 12 Day Pre-General Election Report. If you file on a quarterly basis, you are required to file the 12 Day Pre-General Election Report if your committee makes a contribution or expenditure on behalf of a candidate in the general election, or your committee has not previously reported the contribution or expenditure.

It is important for your report to be available on a timely basis for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of your report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (11 CFR 108.2, 108.3, 108.4).

If your report has been timely filed together with appropriate schedules by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

The failure to file the complete report in a timely manner, if your committee is required to file the report, may result in audit or legal enforcement action.

If you have any questions regarding your filing requirements, please contact the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 23, 1981

Comite Amigos de Jimmy Carter
Adalberto Jurado, Treasurer
G. P. O. Box 1512
San Juan
Puerto Rico 00936

Dear Mr. Jurado:

Your 30 Day Post-General Election campaign finance report, required by the Federal Election Campaign Act, has not been received. This report must cover the period from October 16, 1980 (or from the date of registration or from the closing date of your last report, whichever is later) through November 24, 1980.

It is important for your report to be available on a timely basis for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

If your report has been timely filed together with appropriate schedules by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

The failure to file the complete report in a timely manner may result in audit or legal enforcement action.

If you have any questions regarding your filing requirements, please contact the Reports Analysis Division on our local number (202) 523-4048.

Sincerely,

John D. Gibson

John D. Gibson
Acting Assistant Staff Director
Reports Analysis Division

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BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of)

)

)

)

Comite Amigos De)
Jimmy Carter)

MUR 1354

ORDER TO SUBMIT WRITTEN ANSWERS

TO: Adalberto Jurado, Treasurer
Comite Amigos De Jimmy Carter
GPO Box 1512
San Juan, Puerto Rico 00936

Pursuant to 2 U.S.C. §437d(a)(1), and in furtherance of its investigation in the above-styled matter, the Federal Election Commission hereby orders you to submit written answers to the questions attached to this Order.

Such answers must be submitted under oath and must be forwarded to the Commission within 10 days of your receipt of this Order.

WHEREFORE, the Chairman of the Federal Election Commission has hereunto set his hand in Washington, D.C. on this day of

John Warren McGarry
Chairman

ATTEST:

Marjorie W. Emmons
Secretary to the Commission

Attachment(s)
Excerpt from Committee Report (1 page)
Questions (2 pages)

18

ATTACHMENT TO ORDER TO ANSWER QUESTIONS

The April 10, 1980 report of receipts and expenditures filed by the Committee Amigos de Jimmy Carter (The Committee) (detailed summary page attached for your reference) indicates that your committee made \$12,729.32 in independent expenditures during the period March 1 through April 30, 1980.

1. Please submit an itemization of the above referenced independent expenditures as required by 2 U.S.C. §434.

The April 10, 1980 report of receipts and expenditures list a \$59,000 payment to Joe Franco & Associates, Inc. by the Committee and an outstanding debt of \$159,099.74 owed to Joe Franco & Associates, Inc. for TV and Radio advertisements.

2. Please submit a detailed statement as to the current obligation owed to Joe Franco by the Committee and an itemization of the services provided to the Committee by Joe Franco.
3. Please submit a detailed explanation as to the differentiation between the \$12,729 in independent expenditures made by the Committee and the \$218,100 in contracted services for media advertisements with Joe Franco & Associates, Inc.
4. Did the Committee ever seek authorization from Mr. Carter or any of his agents to receive contributions or make expenditures on his behalf?
5. Identify the organizers, officers, members and personnel of the Committee. Were any of these individuals involved in prior campaign activity on behalf of Mr. Carter? If so, please identify who was so engaged, in what capacity, and on what dates.
6. Did you or any other Committee officers or members discuss or correspond with Mr. Carter or any of his authorized agents regarding his campaign activities? If so, please describe in detail the number and nature of the contacts, the individuals involved, and the substance of the communications.
7. Did Mr. Carter or any of his authorized agents offer any suggestions in regard to the Committee's activities? If so, please describe the nature of the suggestions, and state whether any were acted upon.
8. With regard to Committee solicitations, please describe or respond to the following:
 - a. How were the solicitations conducted?
 - b. In what manner were the contributions received?
 - c. Please attach a copy of any solicitation materials utilized by the Committee.
9. In your response state the source of Committee funds and provide the Commission with a list of the Committee's contributions including contributions from individuals as well as other committees.



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico 00936

Re: MUR 1354

Dear Mr. Jurado:

On , 1981, the Federal Election Commission determined that there is reason to believe that the Comité Amigos De Jimmy Carter violated §§ 434(a)(4), 434(b)(6)(B)(iii) and § 434(b)(8) of the Federal Election Campaign Act of 1971, as amended ("the Act"). The General Counsel's factual and legal analysis, which formed a basis for the Commission's finding, is attached for your information.

Under the Act, you have an opportunity to demonstrate that no action should be taken against you. Please submit any factual or legal materials which you believe are relevant to the Commission's consideration of this matter. Additionally, please submit answers to the enclosed order.

You may consult with an attorney and have an attorney assist you in the preparation of your responses to this order. However, it is required that you submit the information under oath and that you do so within ten days of your receipt of this order.

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

The investigation now being conducted will be confidential in accordance with 2 U.S.C. § 437g(a)(4)(B) and § 437g(a)(12)(A), unless you notify the Commission in writing that you wish the investigation to be made public.

JO

Mr. Adalberto Jurado
Page (2)

For your information, we have attached a brief description of the Commission's procedures for handling possible violations of the Act. If you have any questions, please contact Suzanne M. Callahan, the staff member assigned to this matter, at 202-523-4057.

Sincerely,

Enclosures

General Counsel's Factual and Legal Analysis
Procedures

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FEDERAL ELECTION COMMISSION

GENERAL COUNSEL'S FACTUAL AND LEGAL ANALYSIS

DATE _____

MUR NO. 1354
STAFF MEMBER & TEL. NO.

RESPONDENT Comite Amigos De
Jimmy Carter

Suzanne Callahan

(202) 523-4057

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

SUMMARY OF ALLEGATIONS

On January 28, 1981, the Reports Analysis Division (RAD) referred to the Office of General Counsel, the Comite Amigos De Jimmy Carter ("The Committee") in connection with its failure to file reports of receipts and expenditures in violation of 2 U.S.C. §434a(4).

FACTUAL BASIS AND LEGAL ANALYSIS

ANALYSIS

The Committee registered as an unauthorized committee supporting the candidacy of Jimmy Carter of March 6, 1980. Subsequent to its registration, the Committee filed one report covering March 1 through April 30, 1980.

The report indicates that as of April 30th, the Committee had contracted with Joe Franco & Associates, Inc. for a total of \$218,099.74 in media services, presumably on behalf of President Carter's re-election campaign. Of that amount, \$59,000 has been paid by the Committee and the remaining \$159,099.74 is reported as an outstanding debt. Additionally, the committee reports making \$12,729.32 in independent expenditures.

The Committee was sent non-filer notices in connection with its failure to file the July 15th, October 15th, 12 day pre-general election and 30 day post general election reports on July 22nd, October 22nd, October 29, 1980 and January 23, 1981, respectively. The Committee failed to respond to any of the notices.

Additionally, the committee has failed to file the year end report in violation of §434(a)(4).

While the Committee's detailed Summary Schedule filed with the April 15, 1980 report discloses \$12,729.32 for independent expenditures, it failed to file a corresponding notarized schedule E reporting the particulars of its independent activity in violation of 2 U.S.C. §434(b)(6)(B)(iii).

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The Committee has also failed to disclose the status of its outstanding debt of \$159,099.74 owed to Joe Franco & Associates in violation of 2 U.S.C. §434(b) (8).

Therefore, the General Counsel recommends that the Commission find reason to believe that respondent has violated 2 U.S.C. §§434(a) (4), 434(b) (6) (B) (iii), and 434(b) (8)

RECOMMENDATIONS:

It is recommended that the Commission:

1. Find reason to believe the Committee violated 2 U.S.C. §434(a) (4);
2. Find reason to believe the Committee violated 2 U.S.C. §434(b) (6) (B) (iii); and
3. Find reason to believe the Committee violated 2 U.S.C. §434(b) (8).

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AUTHORIZATION TO ISSUE ORDER

The Commission hereby authorizes the issuance of an
order to the following person in connection with MUR 1354

Adalberto Jurado
GPO Box 1512
San Juan, Puerto Rico

John Warren McGarry
Chairman

Thomas E. Harris
Commissioner

Frank P. Reiche
Vice Chairman

Robert O. Tiernan
Commissioner

Joan D. Aikens
Commissioner

Vernon W. Thompson
Commissioner

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REPORTS ANALYSIS REFERRAL UPDATE

*ORIGIN: RAD

DATE 27 APR 1981 ANALYST Mike Filler
TO: OFFICE OF GENERAL COUNSEL TEAM CHIEF Irene Allen
ATTENTION: Suzanne Callahan
THROUGH: STAFF DIRECTOR PS COMPLIANCE REVIEW Shawn Woodhead/
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS gj Peggy Sims PS

MUR No. MUR 1354 DATE OF ORIGINAL REFERRAL January 28, 1981

**PURPOSE:

RESULTS OF REVIEW

ATTACHMENTS

1. Mailgram sent for failure to timely file
1980 Year End Report - 2/05/81 2

OUTCOME: (if applicable)

ALLEGATION

ATTACHMENTS

Failure to timely file 1980 Year End Report 1

CITE

2 U.S.C. 434(a)

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

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

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ATTACHMENT 1

INDEPENDENT EXPENDITORS

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		TYPE OF FILER COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
COMITE	AMIGOS DE JIMMY CARTER							
	1980 STATEMENT OF ORGANIZATION					28FEB80	4	80FFC/100/5053
	STATEMENT OF ORGANIZATION - AMENDMENT					13JUN80	3	80FEC/110/3856
	APRIL QUARTERLY		72,002			71,839 1MAR80 30APR80	6	80FEC/110/3859
	TOTAL	0	72,002	0	71,839		13	TOTAL PAGES

C99002214 COMITE' AMIGOS DE JIMMY CARTER

1 N 80/02/28

1 A 80/06/13

8 4 0 4 0 4 3 8 0 0 2 1 0 0 5 6 2

3 N 80/06/13 01 80/03/01-80/04/30 G 00072082 00071839

6 80031103859 X

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ATTACHMENT 2

Mailgram text for authorized committees
for 1980 Year End Report
(committee types "I," "D," "N," "P," "X," "Y")

Your Year End campaign finance report, required by the Federal Election Campaign Act, has not been received. This report must cover the period from November 25, 1980 (or from the date of registration or from the closing date of your last report, whichever is later) through December 31, 1980.

It is important for your report to be available on a timely basis for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of your report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (11 CFR 108.2, 108.3, 108.4).

If your report has been timely filed together with all appropriate schedules by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

The failure to file the complete report in a timely manner may result in audit or legal enforcement action.

If you have any questions regarding your filing requirements, please contact the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

John D. Gibson
Acting Assistant Staff Director
Reports Analysis Division

84040482064

4 5 4 0 4 8 2 0 3
REPORTS ANALYSIS REFERRAL SHEET

DATE JANUARY 28, 1981 ANALYST Michael Filler
TO: OFFICE OF GENERAL COUNSEL TEAM CHIEF Irene Allen
THROUGH: STAFF DIRECTOR BR COMPLIANCE REVIEW BS
FROM: ASSISTANT STAFF DIRECTOR FOR REPORTS ANALYSIS JJ

CANDIDATE/COMMITTEE: COMITE AMIGOS DE JIMMY CARTER (C99002214)
TREASURER: Adalberto Jurado
ADDRESS: G.P.O. Box 1512
San Juan, Puerto Rico 00936
AFFILIATE(S): NONE

ALLEGATION(S): Failure to file reports of receipts and expenditures CITE: 2 U.S.C. 434a(4) ATTACHMENT(S)

DATE INITIATED:

MANNER IN WHICH REVIEW WAS INITIATED:

- ☐ Normal Review ☒ Other: Request by Office of General Counsel

ATTACHMENT

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

PERIOD COVERED FROM March 1, 1980 TO April 30, 1980

TOTAL RECEIPTS \$ 72,082.04 TOTAL EXPENDITURES \$ 71,839.32

CASH ON HAND \$ 352.72 DEBTS \$ TO:-0- BY: \$159,099.74

HISTORY:

RESULTS OF REVIEW:

ATTACHMENT

Non-filer notices. See Page Two.

COMMUNICATIONS WITH CANDIDATE/COMMITTEE:

ATTACHMENT

None

REASON(S) FOR REFERRAL:

ATTACHMENT

Violation of Review and Non-Compliance Referral Standard - #1: failure to respond to first notification of non-filing within 20 days, and the financial activity of the committee exceeds \$50,000 in receipts or disbursements.

OTHER PENDING ACTIONS INITIATED BY RAD:

ATTACHMENT

Failure to file 30 Day Post-General Election Report.
Notice sent on January 23, 1981.

8

OTHER RELEVANT INFORMATION:

ATTACHMENT

See Page Two.

PREVIOUS OGC/AUDIT REFERRALS FROM RAD:

None

REPORTS ANALYSIS REFERRAL SHEET

PAGE TWO

COMITE AMIGOS DE JIMMY CARTER

ATTACHMENT

RESULTS OF REVIEW:

Failure to file 1980 July 15 Report. Notice sent on July 22, 1980.	5
Failure to file 1980 October 15 Report. Notice sent on October 22, 1980.	6
Failure to file 1980 12 Day Pre-General Election Report. Notice sent on October 29, 1980.	7

OTHER RELEVANT INFORMATION:

Line 22 of the Detailed Summary Schedule discloses \$12,729.32 for independent expenditures, however a notarized Schedule E has not been provided.	4
Schedule B discloses a \$59,000 payment to Joe Franco & Associates for radio and television advertisements. If the disbursement was an independent expenditure in support of Jimmy Carter, the transaction should have been disclosed on a notarized Schedule E.	4
The committee has failed to disclose the status of \$159,099.74 in outstanding obligations owed to Joe Franco & Associates for radio and television advertisements.	4
The committee has failed to disclose the source of its initial cash on hand of \$100.	4
There are mathematical discrepancies between disbursement figures on the Detailed Summary Schedule and the total disbursement figure disclosed on the Summary Schedule.	4

The committee's original and amended Statements of Organization note that it is a single candidate unauthorized committee supporting Jimmy Carter.	2 & 3
--	-------

84040482065

FEDERAL ELECTION COMMISSION
 COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-80)
 8 4 0 4 0 7 8 2 0 3 7
 INDEPENDENT EXPENDITORS

DATE 22JAN81
 PAGE 1

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			

COMITE' AMIGOS DE JIMMY CARTER						INDEPENDENT EXPENDITURE	ID 9C99002214	
	1980 STATEMENT OF ORGANIZATION					28FEB80	4	80FEC/100/5053
	STATEMENT OF ORGANIZATION - AMENDMENT					13JUN80	3	80FEC/110/3854
	APRIL QUARTERLY		72.082		71.839	1MAR80 -30APR80	4	80FEC/110/3859
	TOTAL	0	72.082	0	71.839		13	TOTAL PAGES

Attachment #1

ATTACHMENT #2

PEC Form 1
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20045

Statement of Organization For a Political Committee

Supporting any candidate for federal office and accepting contribu-
tions or expenditures in excess of \$1,000 in any calendar year in support
of such candidate.

(See Reverse Side For Instructions.)

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must manage separate records with respect to each election.

1. Name of Committee (in full) ☐ Check if name or address is changed
Comité Amigos de Jimmy Carter

2. Identification Number

3. Address (number and street)

Ponce de León 1902, 2do. Piso

4. Date

February 19, 1980

5. City, State and ZIP code

Santurce, Puerto Rico 00909

6. Is this an amended statement? ☐ Yes ☒ No
If "YES" fill in only those lines on which there has been a change.

7. Check one

☐ (a) This committee has been designated as the principal campaign committee for

(Name of Candidate)

a candidate for

(Federal office sought)

in the

(Year of election)

election

to be held in the State of

(State in which election is held)

(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) This committee is supporting only one candidate and is authorized by

(Name of Candidate)

to receive contributions and make expenditures with respect to the

(General, Primary, Runoff, etc.)

election

held in

(Year of election - State)

and will file all reports and statements with the candidate's principal campaign

committee

(If "a," name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (PEC FORM 2a)

☒ (c) The committee supports only one candidate

Jimmy Carter

but is not an authorized committee

(Name of Candidate)

☐ (d) This committee supports more than one Federal candidate and is not a party committee

☐ (e) This committee is a

(National, State, County, City)

committee of the

(Democratic, Republican, etc.)

8. Name of affiliated and/or connected organizations

5. Name and ZIP code

Relationship

NONE

If the registering political committee has identified a "connected organization" above, please indicate type of organization

☐ Corporation

☐ Labor organization

☐ Membership organization

☐ Trade association

☐ Cooperative

☐ Corporation without capital stock

☐ Other (Specify)

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

PSC Form 1
July 1976
Federal Election Commission
1301 K Street, N.W.
Washington, D.C. 20543

Statement of Organization For a Committee

(Page 2)

Name of Committee

Comité Amigos de Jimmy Carter

7 Area, Scope and Jurisdiction of Committee:

- (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 seeking State or local office? ☐ Yes ☒ No
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☐ 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
Jimmy Carter	White House Washington, D.C.	President	Democratic Party

(b) List by name, address, office sought, and party affiliation, any candidate for any other public official 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 the committee is supporting the entire ticket of a party, give name of party:

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
Adalberto Jurado	G.P.O. Box 1512 San Juan, P.R. 00936	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).

Statement of Organization For a Committee

(Page 3)

Name of Committee **Comité Amigos de Jimmy Carter**

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee).

Full name	Mailing address and ZIP code	Title or position
Manuel M. Pérez Rodríguez	403 del Parque, Suite 1001 Santurce, P.R. 00912	President
Adalberto Jurado	G.P.O. Box 1512, San Juan, P.R. 00936	Treasurer
Julio Juan García	Ashford 1485, Santurce, Puerto Rico 00907	Vice-President
Antonio Alfonso	Calle Lila Núm. 1687 Urb. San Francisco, Río Piedras, P.R. 00927	Secretary

12 Does the committee plan to stay in existence 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? New Democratic Party of Puerto Rico

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

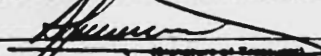
Name of bank, repository, etc.	Mailing address and ZIP code
Banco de Santander de Puerto Rico Account #001-026229	Recinto Sur Núm. 251, San Juan, P.R. 00901

15 List all election reports required to be filed by the committee with State 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 4324a):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

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 pages.

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


(Signature of Secretary)

2/19/80

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. § 437g or § 441 (see instructions)

For further
information
contact

Federal Election Commission
1225 K Street, N.W.
Washington, D.C. 20463

STATEMENT OF ORGANIZATION

JUN 13 1981

1. Name of Committee: AMIGOS DE JIMMY CARTER Date: APRIL 30, 1981
 2. Address (Number and Street): 1902 PONCE DE LEON AVE. STOP 26
 3. City, State and ZIP Code: SAN JUAN, PUERTO RICO 00909

4. Name of Candidate: JIMMY CARTER Candidate Party Affiliation: DEMOCRATIC PARTY Office Sought: P.R. -
 5. Name of Candidate: JIMMY CARTER and a VC or authorized committee
 6. Name of Candidate: JIMMY CARTER and a VC or authorized committee
 7. Name of Candidate: JIMMY CARTER and a VC or authorized committee
 8. Name of Candidate: JIMMY CARTER and a VC or authorized committee
 9. Name of Candidate: JIMMY CARTER and a VC or authorized committee
 10. Name of Candidate: JIMMY CARTER and a VC or authorized committee

11. Name of Any Connected Organization or Affiliated Committee: _____ Mailing Address and ZIP Code: _____ Telephone: _____

12. The following is a list of the committee's connected organizations, groups, clubs, and date types of organization:
 13. Corporation: _____ Corporation with Capital Stock: _____ Labor Organization: _____ Membership Organization: _____ Trade Association: _____ Cooperative: _____

14. Custodian of Records: Name: _____ Address: _____ Phone Number: _____ and Section: _____ the Section: _____ the Section: _____ the Section: _____ the Section: _____

15. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

16. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

17. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

18. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

19. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

20. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

21. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

22. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

23. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

24. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

25. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

26. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

27. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

28. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

29. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

30. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

31. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

32. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

33. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

34. Full Name: _____ Mailing Address and ZIP Code: _____ Title or Position: _____

REPORT OF RECEIPTS AND DISBURSEMENTS
For a Political Committee Other Than an Authorized Committee JUN 13 PM 1.
(Summary Page)

1. Name of Committee (in Full)

AMIGOS DE JIMMY CARTER

Address (Number and Street)

G.P.O. Box 1512

City, State and ZIP Code

SAN JUAN, P. R. 00936

2. Check if address is different than previously reported.

3. REC Ident. Card or Number

4. This committee qualified as a multicandidate com-

mittee during this Reporting Period on _____ date.

4. TYPE OF REPORT (check appropriate boxes)

- (a) ☒ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ Type of Election:
election on _____ in the State of _____
☐ Thirtieth day report following the General Election
on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
☐ YES ☒ NO

SUMMARY

5. Covering Period MARCH 1 Through APRIL 30

6. (a) Cash on Hand January 1, 19____

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts from Line 18:

(d) Subtotal (add lines 6(a) and 6(c) for Column A and
lines 6(a) and 6(c) for Column B)

7. Total Disbursements from Line 23

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee
(itemize on Schedule D or Schedule D)

10. Debts and Obligations Owed BY the Committee
(itemize on Schedule D or Schedule D)

Column A
This Period

Column B
Calendar Year-to-Date

\$	100.00	\$	
\$	72,082.04	\$	
\$	72,182.04	\$	
\$	71,839.32	\$	
\$	352.72	\$	352.72
\$		\$	
\$	159,099.74	\$	

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

For further information contact:

Federal Election Commission
P.O. Box 200406-9000
Washington, D.C. 20040-4058

ADALBERTO JURADO

Title of Person Signing Report

SIGNATURE OF TREASURER

4/30/80

NOTE: Submission of this report does not constitute a statement of the committee's position on any issue.

All previous versions of the FEC FORM 2 and FEC FORM 2a are obsolete and should not be used.

FEC FORM 2

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

RECEIVED

JUN 13 PM 1

Name of Committee or Fund

AMIGOS DE JIMMY CARTER

Report Covering the Period

From March 1

To April 30/80

COLUMN A
Total This Period

COLUMN B
Calendar Year to Date

I. RECEIPTS

11 CONTRIBUTIONS (other than loans) FROM

a) Individuals/Persons Other Than Political Committees

(Include Every Unitemized \$ 72,082.04)

b) Political Party Committees

c) Other Political Committees

d) TOTAL CONTRIBUTIONS (other than loans) 11a, 11b and 11c

72,082.04

12 TRANSFERS FROM AFFILIATED OTHER PARTY COMMITTEES

13 ALL LOANS RECEIVED

14 LOAN REPAYMENTS RECEIVED

15 OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)

16 REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES
AND OTHER POLITICAL COMMITTEES

17 OTHER RECEIPTS (Donations, Interest, etc.)

18 TOTAL RECEIPTS (Add 11a, 12, 13, 14, 15, 16 and 17)

72,082.04

II. DISBURSEMENTS

19 OPERATING EXPENDITURES

218,099.74

20 TRANSFERS TO AFFILIATED OTHER PARTY COMMITTEES

21 CONTRIBUTIONS TO FEDERAL CANDIDATES AND
OTHER POLITICAL COMMITTEES

22 INDEPENDENT EXPENDITURES (See Schedule E)

12,729.32

23 COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES
(See Schedule E) (See Schedule F)

24 LOAN REPAYMENTS MADE

25 LOANS MADE

26 REFUNDS OF CONTRIBUTIONS TO

a) Individuals/Persons Other Than Political Committees

b) Political Party Committees

c) Other Political Committees

d) TOTAL CONTRIBUTION REFUNDS (Add 26a, 26b and 26c)

27 OTHER DISBURSEMENTS

28 TOTAL DISBURSEMENTS (Add 19, 20, 21, 22, 23, 24, 25, 26d and 27)

29 NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES

30 TOTAL CONTRIBUTIONS (other than loans) 11a, 11b and 11c

72,082.04

31 TOTAL CONTRIBUTIONS (including loans) 11a, 11b and 11c

72,082.04

32 NET CONTRIBUTIONS (other than loans) 29 minus 30

33 TOTAL OPERATING EXPENDITURES (including loans) 19

230,829.06

34 OFFSETS TO OPERATING EXPENDITURES (including loans) 15

159,099.74

35 NET OPERATING EXPENDITURES (including loans) 33 minus 34

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page 1 of 1 for
 LINE NUMBER 1
 Use separate schedule for each
 category of the following
 Summary Page:

Any information received from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee in Full:
AMIGOS DE JIMMY CARTER

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JOE FRANCO & ASSOC. INC. - 1120 ASHFORD AVE. CONDADO/SANTUON P.R. 00907	ADV. RADIO & T.V. - Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/4/80	\$59,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
SUBTOTAL (Do not include this page number)			
TOTAL (Do not include this page number)			

900317333

Page ____ of ____ of
LINE NUMBER ____
THE ABOVE CAPTIONED
FOR EACH NUMBERING NO.

Name of Committee in Full		Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
AMIGOS DE JIMMY CARTER					
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
JOE FRANCO ASSOCIATES INC 1120 ASHFORD AVE CONDADO/SAN JUAN, P.R. 00907		218,092.74		59,000.00	159,092.74
Nature of Debt (Purpose):					
ADVERTISEMENT T.V. FRANKO					
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
Nature of Debt (Purpose):					
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
Nature of Debt (Purpose):					
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
Nature of Debt (Purpose):					
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
Nature of Debt (Purpose):					
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
Nature of Debt (Purpose):					
G. Full Name, Mailing Address and Zip Code of Debtor or Creditor:					
Nature of Debt (Purpose):					
<p>1. DEBITED TO This Period This page only</p> <p>2. CREDITED This Period This page only</p> <p>3. DEBITED TO AND CREDITED TO from Schedule D This page only</p> <p>4. DEBITED TO and CREDITED TO from Schedule D This page only</p>					

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1
 THIS SCHEDULE SUPPLEMENTARY TO FORM 1040
 REPORT OF THE COMPLETER
 SUMMARY PAGE

Any information on this schedule should be reported on Form 1040 or Form 1041 by any person for the purpose of determining liability for tax.
 Complete this schedule only if you have received any of the following from any of the following:

Name of Donor: **AMIGOS DE JIMMY CARTER**

A. Full Name, Mailing Address and ZIP Code
COOPERATIVA DE AHORROS Y CREDITO ORIENTAL
BOX 321 NUALAO, P.R. 00661

Receipt for: **2/26/80** **\$100.00**

B. Full Name, Mailing Address and ZIP Code
JORGE F. ROMANY
APARTADO 4607
SANTUAN, P.R. 00905

Receipt for: **2/26/80** **\$50.00**

C. Full Name, Mailing Address and ZIP Code
CENTRO NEURO CARDIOLOGICO
SAN RAFAEL 1353
SANTURCE, P.R. 00919

Receipt for: **3/28/80** **\$100.00**

D. Full Name, Mailing Address and ZIP Code
PARTIDO NUEVO PROGRESISTA
LARES, P.R. 00652
BOX 8-237 BESULOS

Receipt for: **3/28/80** **\$100.00**

E. Full Name, Mailing Address and ZIP Code
CORDERO DEVELOPMENT
BOX 8-237 BESULOS
DOUGLAS, P.R. 00652

Receipt for: **3/28/80** **\$50.00**

F. Full Name, Mailing Address and ZIP Code
ANGEL L. CANINO E HIJOS
CALLE FERRAN #1514
URB. ANTONSANTI, R.C. PIEDRAS 00927

Receipt for: **3/28/80** **\$300.00**

G. Full Name, Mailing Address and ZIP Code
PEDRO RODRIGUEZ
323 Ing. J.B. RODRIGUEZ ST
HATO REY, P.R. 00918

Receipt for: **2/28/80** **\$50.00**

SUBTOTAL of Receipts for the year: **\$750.00**

TOTAL of Receipts for the year: **\$750.00**

34040482075

3075173333

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of 2
 This document should be filed with the return of the taxpayer for the year in which the receipts were received.

Any information received from such Receipts or Statements may not be used or used in any manner for the purpose of obtaining credit but only for the purpose of determining the amount of the tax credit.

Name of Employer: **AMIGOS DE JIMMY CARTER**

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt (This Period)
ZAIDA RODRIGUEZ RODRIGUEZ 028 URB. TORREMOJONES GUAYNABO, P.R. 00657	Occupation	3/31/80	\$50.00
Receipt for: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Other (specify) _____ Aggregate Year-to-Date-\$ _____			
RAY K. & MAULOOK, WOOD GEORGIA, U.S.A.	Occupation		\$100.00
Receipt for: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Other (specify) _____ Aggregate Year-to-Date-\$ _____			
RAMIRO RAMIREZ SAN JUAN, P.R. -	Occupation		\$100.00
Receipt for: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Other (specify) _____ Aggregate Year-to-Date-\$ _____			
SAMANTHA FASHIONS BOX 1271 OLD SAN JUAN 00902	Occupation		\$50.00
Receipt for: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Other (specify) _____ Aggregate Year-to-Date-\$ _____			
MONSITA MOREYDA DEBAILA BOX 1271 OLD SAN JUAN 00902	Occupation		\$50.00
Receipt for: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Other (specify) _____ Aggregate Year-to-Date-\$ _____			
MC. J. GARCORTIE TORO BOX 8845 SANTURCE FUEZ TUCAS STA. P.R. 00910	Occupation		\$100.00
Receipt for: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Other (specify) _____ Aggregate Year-to-Date-\$ _____			
AMIGOS JUNIOR GRUZ GUAYNABO, P.R. 00657	Occupation		\$100.00
Receipt for: <input checked="" type="checkbox"/> Cash <input type="checkbox"/> Other (specify) _____ Aggregate Year-to-Date-\$ _____			

TOTAL: \$1000.00

84040482077

300317333

T



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

July 22, 1980

Comite' Amigos De Jimmy Carter
Adalberto Jurado
1902 Ponce De Leon Ave./Stop 26
San Juan, Puerto Rico 00909

Dear Mr. Jorado:

Your Campaign Finance Report for the period from April 1, 1980 (or from the date of registration) to June 30, 1980, required by the Federal Election Campaign Act, has not been received.

For the purpose of timely public disclosure, it is important that your report be available for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 (or with the Clerk of the House or Secretary of the Senate, as appropriate). A copy of your report, or the relevant portions of your report, should also be filed with the Secretary of State, or equivalent State Officer of the appropriate State(s). (11 CFR 108.2, 108.3, 108.4).

If you have filed the complete report (including all appropriate schedules) timely by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

Failure to file the complete report may result in audit or legal enforcement action.

If you have any questions regarding your filing requirements, please contact the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)523-4048.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

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FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

October 22, 1980

Comite' Amigos De Jimmy Carter
Adalberto Jurado, Treasurer
1902 Ponce DeLeon Ave. Stop 26
San Juan, Puerto Rico 00909

Your October 15 Quarterly campaign finance report, required by the Federal Election Campaign Act, has not been received. This report must cover the period from July 1, 1980 (or from the date of registration or the closing date of your last report, whichever is later) through September 30, 1980.

It is important for your report to be available on a timely basis for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of your report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (11 CFR 108.3, 108.4).

If your report has been timely filed together with appropriate schedules) timely by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

The failure to file the complete report in a timely manner may result in publication, legal enforcement or audit action.

If you have any questions regarding this matter, please contact the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)523-4172.

Sincerely,

Thomas J. Haselhorst
Assistant Staff Director
Reports Analysis Division

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FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

October 29, 1980

Comite Amigos de Jimmy Carter
 Adalberto Jurado
 1902 Ponce de Leon Avenue/Stop 26
 San Juan
 Puerto Rico

Dear Mr. Jurado:

Your 12 Day Pre-General Election campaign finance report, required by the Federal Election Campaign Act, has not been received. This report must cover the period from October 1, 1980 (or from the date of registration or the closing date of your last report, whichever is later) through October 15, 1980.

If you file on a monthly basis, you must file the 12 Day Pre-General Election Report. If you file on a quarterly basis, you are required to file the 12 Day Pre-General Election Report if your committee makes a contribution or expenditure on behalf of a candidate in the general election, or your committee has not previously reported the contribution or expenditure.

It is important for your report to be available on a timely basis for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463 (or with the Clerk of the House or the Secretary of the Senate, as appropriate). A copy of your report or its relevant portions should also be filed with the Secretary of State or equivalent state officer (11 CFR 108.2, 108.3, 108.4).

If your report has been timely filed together with appropriate schedules by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

The failure to file the complete report in a timely manner, if your committee is required to file the report, may result in audit or legal enforcement action.

If you have any questions regarding your filing requirements, please contact the Reports Analysis Division on our toll free number (800)424-9530. Our local number is (202)357-0026.

Sincerely,

Thomas J. Haselhorst
 Assistant Staff Director
 Reports Analysis Division

34040482030



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

January 23, 1981

Comite Amigos de Jimmy Carter
Adalberto Jurado, Treasurer
G. P. O. Box 1512
San Juan
Puerto Rico 00936

Dear Mr. Jurado:

Your 30 Day Post-General Election campaign finance report, required by the Federal Election Campaign Act, has not been received. This report must cover the period from October 16, 1980 (or from the date of registration or from the closing date of your last report, whichever is later) through November 24, 1980.

It is important for your report to be available on a timely basis for public inspection. The report should be filed immediately with the Federal Election Commission, 1325 K Street, N.W., Washington, D.C. 20463.

If your report has been timely filed together with appropriate schedules by certified or registered mail, please notify us immediately, in writing, of the certified or registered number and the date that the report was sent.

The failure to file the complete report in a timely manner may result in audit or legal enforcement action.

If you have any questions regarding your filing requirements, please contact the Reports Analysis Division on our local number (202)523-4048.

Sincerely,

John D. Gibson

John D. Gibson
Acting Assistant Staff Director
Reports Analysis Division

340404820031

MUR 1354



FEDERAL ELECTION COMMISSION
WASHINGTON, D.C. 20463

February 20, 1981

MEMORANDUM

TO: Robert Costa
Assistant Staff Director
Audit Division

THROUGH: B. Allen Clutter III
Staff Director

FROM: Charles N. Steele *CS*
General Counsel

SUBJECT: Audit Update Analysis of Carter/Mondale
Submission #17

The attached Audit Update, as it pertains to the Comite Amigos de Jimmy Carter, is being returned to your office as the subject information is part of a MUR based on a RAD referral.

For your information, this matter has been numbered MUR 1354. Should additional information come to your attention regarding the Comite Amigos de Jimmy Carter, please advise the Office of General Counsel or the Reports Analysis Division.

84040482082



FEDERAL ELECTION COMMISSION

WASHINGTON, D.C. 20463

December 1, 1980

MEMORANDUM

TO: CHARLES N. STEELE
GENERAL COUNSEL

THROUGH: B. ALLEN CLUTTER, III *AK*
STAFF DIRECTOR

FROM: ROBERT J. COSTA *RJ*

SUBJECT: A. UPDATE OF ANALYSIS OF CARTER/MONDALE
SUBMISSION 17
B. COMITE' AMIGOS DE JIMMY CARTER

A. In reference to the Submission 17 matter previously referred to your office on August 12, 1980, attached please find copies of the check and check request relating to the fundraising event held at the Silver Palace Restaurant, (Attachments I and II). Please note that the check request provides information concerning the expected number of participants, and the charge per person to the Committee.

B. During the review to update the Carter/Mondale Committee's Statement of Net Outstanding Campaign Obligations, the Audit staff noted documents (Attachments VIII through X), which indicate a possible relationship between the Carter/Mondale Committee and an independent expenditure committee registered as the Komite' Amigos de Jimmy Carter (Attachment IV).

On March 6, 1980, the Komite' Amigos de Jimmy Carter ("the Komite'") registered as a non-authorized committee supporting the Candidacy of Jimmy Carter (Attachment III). Subsequent reports filed by this committee (Attachments V and VI) disclosed a total of \$72,082.04 in receipts; payments to Joe Franco and Associates, Inc., a media firm, of \$59,000; and, as of April 30, 1980, outstanding debts to Joe Franco and Associates totalling \$159,099.74. Total expenditures reported at April 30, 1980 were \$230,829.06, of which \$218,099.74 represents the payments and amounts due to Joe Franco and Associates, Inc. The remaining \$12,729.32 is reported as "independent expenditures"; no detail is available on these expenditures because the Komite' did not file a Schedule E. As of October 30, 1980, no further reports have been filed by the Komite'.

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During the review of the Carter/Mondale expenditure and debt records, the Audit staff noted payments to Joe Franco and Associates, Inc. on April 14, 1980 for \$30,010.00 (Attachment VII), on July 24, 1980 for \$876.00 (Attachment VIII), and on September 3, 1980 for \$9,225.00 (Attachment IX). A letter attached to the September 3, 1980 check copy (Attachment X) indicates that the media firm referred for collection outstanding invoices totalling \$33,614.50. The referral from the media agency's law firm was dated August 11, 1980.

Though the payments made by the Carter/Mondale committee cannot be directly linked to the outstanding debt of the Comite' Amigos de Jimmy Carter (insufficient documentation), a question as to the independence of the two committees is raised by their common use of the same media firm. The Audit staff is therefore referring the matter to the Office of General Counsel for review and consideration.

Attachments as stated

840404882034

COMMITTEE, INC.
OPERATING ACCOUNT

March 3 19 80

15720
840

PAY \$5,600.00

\$ 5,600.00

PAY
TO THE ORDER OF

Silver Palace Restaurant
52 Eavery
New York, NY

NON NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW

IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DATE	DESCRIPTION	AMOUNT
3-3-80	Meetings - Food (Fundraising) FL04, 2-21, NYC	\$5,600.00

CARTER-MONDALE PRESIDENTIAL COMMITTEE, INC.
OPERATING ACCOUNT

WST Estimate Attached

WST Estimate Attached

Proposal Attached

Agreement/Contract Attached

Receipts Attached

(Do Not Write Below This Line - For Approval Purposes Only)

Jim Fisher
Cost Center Director

Date _____ Amount _____

[Signature]
Treasurer/Controller

Date 3-3-80 C/C _____

THIS FORM MUST BE SUBMITTED TO CONTROLLER FOR ALL CHECKS

EXPENDITURE/CHECK REQUEST

TO: Evan Dohelle, Cost Center Director DATE 2/27/80

FROM: Sandy Oreste

SUBJECT: Request for Expenditure Approval/Check Request
(Give Complete Details of Request)

FL04

Silver Palace Restaurant
Name to be Used on Check

need by Feb. 29, 1980

52 Bowery
Address

New York New York
Address

PURPOSE OF EXPENDITURE: DETAILED PARTICULARS

Cost of food, etc. for Fundraiser Feb. 21 \$5,600.00
 0 \$8 per person X 700 people
 2 (includes guest, press, silent service)

DOCUMENTATION:

<input checked="" type="checkbox"/> Purchase Order Attached	_____	Invoice Attached	_____
<input checked="" type="checkbox"/> Cost Estimate Attached	_____	Order Form Attached	_____
<input checked="" type="checkbox"/> Proposal Attached	_____	Agreement/Contract Attached	_____
<input checked="" type="checkbox"/>	_____	Receipts Attached	_____

(Do Not Write Below This Line - For Approval Purposes Only)

Din Sichen
Cost Center Director

Date _____ Amount _____

[Signature]
Treasurer/Controller

Date 3-3-80 C/C _____

PEC Form 1
July 1978
Federal Election Commission
1215 N Street, N.W.
Washington, D.C. 20543

Statement of Organization For a Political Committee

Supporting any candidate for federal office and anticipating contributions or expenditures in excess of \$1,000 in any calendar year in support of such candidate(s).

(See Reverse Side For Instructions.)

111

100 100 11:35

Note: Committees authorized by a candidate to receive contributions and make expenditures in connection with more than one election must maintain separate records with respect to each election.

1(a) Name of Committee (see full) <input type="checkbox"/> Check if name or address is changed Comité Amigos de Jimmy Carter	2 Identification Number
1(b) Address (number and street) Ponce de León 1902, 2do. Piso	3 Date February 19, 1980
1(c) City, State and ZIP code Santurce, Puerto Rico 00909	4 Is this an amended statement? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No If "YES" fill in ONLY THOSE LINES ON WHICH THERE HAS BEEN A CHANGE

5 Check one
☐ (a) The committee has been designated as the principal campaign committee for _____ (Name of Candidate)
a candidate for _____ in the _____ (Year of election)
to be held in the State of _____ (State in which election is held)
(THE PRINCIPAL CAMPAIGN COMMITTEE WILL FORWARD TO THE COMMISSION A COPY OF THE STATEMENT OF ORGANIZATION FOR EACH AFFILIATED COMMITTEE REQUIRED TO FILE WITH IT.)

☐ (b) The committee is supporting only one candidate, and is authorized by _____ (Name of Candidate)
to receive contributions and make expenditures with respect to the _____ (General Primary, Runoff, etc.)
held in _____, and will file all reports and statements with the candidate's principal campaign
committee _____ (Full name of principal campaign committee)

(ATTACH A COPY OF CANDIDATE'S WRITTEN AUTHORIZATION.) (PEC FORM 2a)

☒ (c) The committee supports only one candidate, Jimmy Carter (Name of Candidate), but is not an authorized committee.

☐ (d) The committee supports more than one Federal candidate and is not a party committee.

☐ (e) The committee is a _____ Committee of the _____ Party
(National, State, county, city) (Democrat, Republican, etc.)

6 Name of affiliated and/or connected organizations	Mailing address and ZIP code	Relationship
NONE		

If the registering political committee has identified a "connected organization" above, please indicate type of organization.
☐ Corporation ☐ Labor organization ☐ Membership organization ☐ Trade association ☐ Cooperative
☐ Corporation without capital stock ☐ Other (please specify)

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).

84040482037

00071005053

Page 1
Date: 11/1/78
Print: Finance Commission
1301 N. Street, N.W.
Washington, D.C. 20543

Statement of Organization For a Committee

(Page 2)

Name of Committee

Comité Amigos de Jimmy Carter

7 Area, Scope and Jurisdiction of Committee:

- (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 seeking State or local office? ☐ Yes ☒ No
(d) Will it support or does it anticipate supporting directly or indirectly, candidates for Federal office in excess of \$1,000 in a calendar year? ☒ Yes ☐ No

8 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
Jimmy Carter	White House Washington, D.C.	President	Democratic Party

9 List by name, address, office sought, and party affiliation, any candidate for any other public office 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			

10 If the committee is supporting the entire ticket of a party, give name of party:

11 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
Adalberto Jurado	G.P.O. Box 1512 San Juan, P.R. 00936	Treasurer

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

PEC Form 1
July 1976
Federal Election Commission
1325 K Street, N.W.
Washington, D.C. 20463

Statement of Organization For a Committee

(Page 3)

Name of Committee **Comité Amigos de Jimmy Carter**

11 List by name, address and position, other principal officers of the committee (include chairman, treasurer, secretary, assistant treasurer, assistant secretary, members of finance committee and):

Full name	Mailing address and ZIP code	Title or position
Manuel M. Pérez Rodríguez	403 del Parque, Suite 1001 Santurce, P.R. 00912	President
Adalberto Jurado	G.P.O. Box 1512, San Juan, P.R. 00936	Treasurer
Julio Juan García	Ashford 1485, Santurce, Puerto Rico 00907	Vice-President
Antonio Alfonso	Calle Lila NÚm. 1687 Urb. San Francisco, Río Piedras, P.R. 00927	Secretary

12 Does this committee plan to stay in existence 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? New Democratic Party of Puerto Rico

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

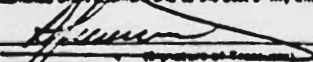
Name of bank, repository, etc.	Mailing address and ZIP code
Banco de Santander de Puerto Rico Account #001-026229	Recinto Sur NÚm. 251, San Juan, P.R. 00901

15 List all election reports returned to be filed by this committee with State 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 4304a1):

Report title	Dates required	Name and position of recipient	Mailing address and ZIP code

Submit additional information on separate continuation sheets consecutively labeled and attached to this Statement of Organization, indicate in the appropriate section above when information is continued on separate pages.

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


(Signature of Secretary)

2/19/80

(Date)

Note: Submission of false, erroneous, or incomplete information may subject the person signing this statement to the penalties of 2 U.S.C. § 437g or § 441 (see instructions)

For further
information
contact

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

JIMMY CARTER

140:

0031905

No. 416213

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

RETURN RECEIPT REQUESTED

FEDERAL ELECTION COMMISSION
COMMITTEE INDEX OF DISCLOSURE DOCUMENTS - (C) (79-00)

DATE 30OCT80
PAGE 1

IV

INDEPENDENT EXPENDITORS

COMMITTEE	DOCUMENT	RECEIPTS		EXPENDITURES		COVERAGE DATES	# OF PAGES	MICROFILM LOCATION
		PRIMARY	GENERAL	PRIMARY	GENERAL			
WHITE' AMIGOS DE JIMMY CARTER								ID #C99002214
	1900 STATEMENT OF ORGANIZATION					20FEB80		4 80FEC/100/5053
	STATEMENT OF ORGANIZATION - AMENDMENT					13JUN80		3 80FEC/110/3856
	APRIL QUARTERLY		72,002			1MAR80 -30APR80		6 80FEC/110/3859
	TOTAL	0	72,002	0		71,039		13 TOTAL PAGES

84040482091

STATEMENT OF ORGANIZATION

(see reverse side for instructions)

JUN 13 PM 1

1. (a) Name of Committee (in Full) AMIGOS DE JIMMY CARTER 2. Date APRIL 30-1980
 (b) Address Number and Street 1902 PONCE DE LEON AVE. STOP 26 3. FEC Identification Number

(c) City, State and ZIP Code SAN JUAN, PUERTO RICO 00909 4. Is this an amended Statement? ☐ YES ☒ NO

3. TYPE OF COMMITTEE (check one):

☐ (a) This committee is a principal campaign committee. (Complete the candidate information below.)
☐ (b) This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)
JIMMY CARTER DEMOCRATIC PARTY P.R. -
 Name of Candidate Candidate Party Affiliation Office Sought State/District

☐ (c) This committee supports/opposes only one candidate JIMMY CARTER and is NOT an authorized committee
 (name of candidate)

☐ (d) This committee is a _____ committee of the DEMOCRATIC PARTY Party
 (National, State or subordinate) (Democratic, Republican, etc.)

☐ (e) This committee is a separate segregated fund.

☐ (f) This committee supports/opposes more than one Federal candidate and is NOT a separate segregated fund nor a party committee.

6	Name of Any Connected Organization or Affiliated Committee	Mailing Address and ZIP Code	Relationship

If the registering political committee has identified a "connected organization" above, please indicate type of organization:

☐ Corporation ☐ Corporation w/o Capital Stock ☐ Labor Organization ☐ Membership Organization ☒ Trade Association ☐ Cooperative

7. Custodian of Records: Identify by name, address (phone number - optional) and position, the person in possession of committee books and records

Full Name Mailing Address and ZIP Code Title or Position

ADALBERTO JURADO G.P.O. BOX 1512 S. JUAN P.R. 00936 TREASURER

8. Treasurer: List the name and address (phone number - optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name Mailing Address and ZIP Code Title or Position

ADALBERTO JURADO G.P.O. BOX 1512 TREASURER
TEL. (809) 789-5095 SAN JUAN, P.R. 00936

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Mailing Address and ZIP Code

BANCO DE SANTANDER
SAN JUAN BRANCH

BANCO DE SANTANDER
SAN JUAN, PUERTO RICO 00902

ACCOUNT # 001-026229

CAJONTO SUR #251

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

ADALBERTO JURADO
 Name of Principal Officer or Treasurer

[Signature]
 SIGNATURE OF TREASURER

APRIL 30-1980
 Date

NOTE: Each item on this Statement of Organization must be signed by the person signing this Statement and the date signed (L.D.C. 5407)

For further information contact:

Federal Election Commission Tel. Free 800-424-9600 Local 800-800-4068

FEC FORM 1000

81209323

DETAILED SUMMARY PAGE
of Receipts and Disbursements
(Page 2, FEC FORM 3X)

JUN 13 PM 1:00

Name of Committee (in Full)

AMIGOS DE JIMMY CARTER

Report Covering the Period:

From MARCH 1 To APRIL 30/80

	COLUMN A Total This Period	COLUMN B Calendar Year-to-Date
I. RECEIPTS		
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(Memo Entry Unitemized \$ <u>72,082.04</u>)		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTIONS (other than loans) (add 11a, 11b and 11c)	<u>72,082.04</u>	
12. TRANSFERS FROM AFFILIATED/OTHER PARTY COMMITTEES		
13. ALL LOANS RECEIVED		
14. LOAN REPAYMENTS RECEIVED		
15. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.)		
16. REFUNDS OF CONTRIBUTIONS MADE TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
17. OTHER RECEIPTS (Dividends, Interest, etc.)		
18. TOTAL RECEIPTS (Add 11d, 12, 13, 14, 15, 16 and 17)	<u>72,082.04</u>	
II. DISBURSEMENTS		
19. OPERATING EXPENDITURES	<u>218,099.74</u>	
20. TRANSFERS TO AFFILIATED/OTHER PARTY COMMITTEES		
21. CONTRIBUTIONS TO FEDERAL CANDIDATES AND OTHER POLITICAL COMMITTEES		
22. INDEPENDENT EXPENDITURES (Use Schedule E)	<u>12,729.32</u>	
23. COORDINATED EXPENDITURES MADE BY PARTY COMMITTEES (2 U.S.C. §441a(d)) (Use Schedule F)		
24. LOAN REPAYMENTS MADE		
25. LOANS MADE		
26. REFUNDS OF CONTRIBUTIONS TO		
(a) Individuals/Persons Other Than Political Committees		
(b) Political Party Committees		
(c) Other Political Committees		
(d) TOTAL CONTRIBUTION REFUNDS (add 26a, 26b and 26c)		
27. OTHER DISBURSEMENTS		
28. TOTAL DISBURSEMENTS (Add Lines 19, 20, 21, 22, 23, 24, 25, 26d and 27)		
III. NET CONTRIBUTIONS AND NET OPERATING EXPENDITURES		
29. TOTAL CONTRIBUTIONS (other than loans) from Line 11d	<u>72,082.04</u>	
30. TOTAL CONTRIBUTION REFUNDS from Line 26d	<u>72,082.04</u>	
31. NET CONTRIBUTIONS (other than loans) (subtract Line 30 from Line 29)		
32. TOTAL OPERATING EXPENDITURES from Line 19	<u>230,829.06</u>	
33. OFFSETS TO OPERATING EXPENDITURES from Line 15	<u>159,099.74</u>	
34. NET OPERATING EXPENDITURES (subtract Line 33 from Line 32)		

840403348209337

JUN 13 PM 11

(Summary Page)

1. Name of Committee (in Full)

AMIGOS DE JIMMY CARTER

Address (Number and Street)

G.P.O. Box 1512

City, State and ZIP Code

SAN JUAN, P. R. 00936

☐ Check if address is different than previously reported.

2. FEC Identification Number

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

(a) ☒ April 15 Quarterly Report

☐ July 15 Quarterly Report

☐ October 15 Quarterly Report

☐ January 31 Year End Report

☐ July 31 Mid Year Report (Non-election Year Only)

☐ Monthly Report for _____

☐ Twelfth day report preceding _____ (Type of Election)
election on _____ in the State of _____

☐ Thirtieth day report following the General Election
on _____ in the State of _____

☐ Termination Report

(b) Is this Report an Amendment?

☐ YES

☐ NO

SUMMARY

5. Covering Period MARCH 1 Through APRIL 30

6. (a) Cash on Hand January 1, 19____

(b) Cash on Hand at Beginning of Reporting Period

(c) Total Receipts (from Line 18)

(d) Subtotal (add lines 6(b) and 6(c) for Column A and
lines 5(a) and 5(c) for Column B)

7. Total Disbursements (from Line 28)

8. Cash on Hand at Close of Reporting Period (subtract line 7 from 6(d))

9. Debts and Obligations Owed TO the Committee
(Itemize all on Schedule C or Schedule D)

10. Debts and Obligations Owed BY the Committee
(Itemize all on Schedule C or Schedule D)

Column A
This Period

Column B
Calendar Year-to-Date

\$

\$ 100.00

\$ 72,082.04

\$ 72,182.04

\$ 71,839.32

\$ 352.72 \$ 352.72

\$

\$ 159,099.74

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

ADALBERTO JURADO

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5407g.

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

FEC FORM 3X 3-80

840404820943333

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ____ of ____ for
 LINE NUMBER ____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

AMIGOS DE JIMMY CARTER

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JOE FRANCO & ASSOC. INC. 1120 ASHFORD AVE. CONDADO/SANTUAN, P.R. 00907	ADV. RADIO & T.V. - Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/4/80	\$59,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

800310330
84040482095

SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page of for
LINE NUMBER
(Use separate schedules
for each numbered line)

Name or Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
AMIGOS DE JIMMY CARTER				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor JOE FRANCO & ASSOCIATES INC. 1120 ASHFORD AVE CONDADO/SAN JUAN, PR. 00907		28,099.74		59,000.00
Nature of Debt (Purpose): ADVERTISMENT { T.V. RADIO }				159,099.74
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1. SUBTOTALS This Period This Page (optional)				
2. TOTAL This Period (last page this line only)				
3. TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4. ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

84040482096
30031103851

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee on Full

AMIGOS DE JIMMY CARTER

A. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
COOPERATIVA DE AHORROS Y CREDITO ORIENTAL BOX 221 HUMACAO, P.R. 00661			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	2/26/80	\$100.00
Aggregate Year-to-Date—\$			
B. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
JORGE F. ROMANY APARTADO 4607 SAN JUAN, P.R. 00905			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	2/26/80	\$50.00
Aggregate Year-to-Date—\$			
C. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
CENTRO NEURO CARDIOLOGICO SAN RAFAEL 1353 SANTURCE, P.R. 00909			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	3/28/80	\$100.00
Aggregate Year-to-Date—\$			
D. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
PARTIDO NUEVO PROGRESISTA LARES, P.R. CO.— BOX 8-237 BETULOS			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	3/28/80	\$100.00
Aggregate Year-to-Date—\$			
E. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
CORDERO DEVELOPMENT BOX 8-237 BETULOS SABALA P.R. CO 00652			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	2/28/80	\$50.00
Aggregate Year-to-Date—\$			
F. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
ANGEL L. CANINO E HIJOS CALLE FERRAN #1514 URB. ANTONSANTI RIOPIEDRAS 00927			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	3/28/80	\$300.00
Aggregate Year-to-Date—\$			
G. Full Name, Mailing Address and ZIP Code	Name of Employer	Date (month, day, year)	Amount of Each Receipt This Period
PEDRO RODRIGUEZ 323 Ing. J. B. RODRIGUEZ ST HATO REY, P.R. 00918			
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Occupation	2/28/80	\$50.00
Aggregate Year-to-Date—\$			

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

3003117333
84040482097

SCHEDULE A

ITEMIZED RECEIPTS

LINE NUMBER _____
(Use separate schedule(s) for each category of the Detailed Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full):

AMIGOS DE JIMMY CARTER

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>ZAIDA RODRIGUEZ RODRIGUEZ D28 URB. TORREMOLINOS GUAYNABO P.R. 00657</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p> <p>3/28/80</p>	<p>Amount of Each Receipt This Period</p> <p>\$50.00</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>RAY K. & MAULDA K. WOOD GEORGIA, U.S.A.</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>RAMIRO RAMIREZ SAN JUAN, P.R. —</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>SAMANTHA FASHIONS BOX 1271 OLD SAN JUAN 00902</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$50.00</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>MONSITA MOREYDA DE PAULA BOX 1271 OLD SAN JUAN 00902</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$50.00</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>LIC. JORGE ORTIZ TORO BOX 8845 SANTURCE POEZ TUNCO STA. P.R. 00910</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>AMIGOS JUNIOR GRUZ GUAYNABO, P.R. 00657</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>

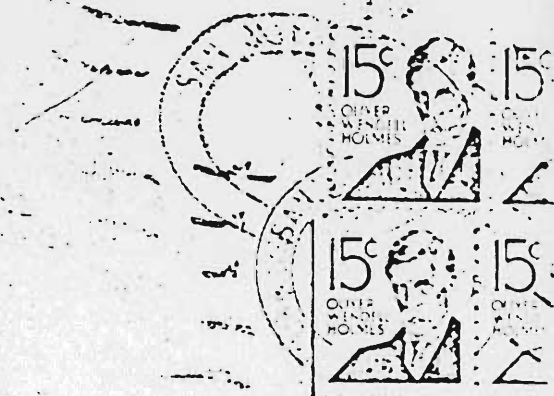
SUBTOTAL of Receipts This Page (not one)

TOTAL This Period (last page this line number only)

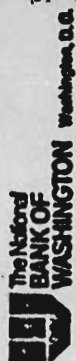
309,1133
84040482093

DE JIMMY CARTER
98X 1512
AD, P.R. 00936

1 3
1 2
1 8
3 4
3 0
3 0
3 3
3 3
3 3



THE FEDERAL ELECTION COMMISSION
1325 K STREET, N.W.
WASHINGTON, D.C. 20463



OPERATING ACCOUNT

April 14 1980

15-720
540PAY
TO THE ORDER OF

\$ 30,010.00

Joe Franco & Associates Inc.
1120 Ashford Avenue
San Juan, PR 00907**NON NEGOTIABLE**

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW

IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DATE	DESCRIPTION	AMOUNT
4-14-80	Media Space/Time - Advertising (PR)	\$30,010.00

CARTER-MONDALE PRESIDENTIAL COMMITTEE, INC.
OPERATING ACCOUNT

Cost Estimate Attached

Order Form Attached

Proposal Attached

Agreement/Contract Attached

8

Receipts Attached

(Do Not Write Below This Line - For Approval Purposes Only)

Therese Phelps

Joe Donna Saymulla

Date

Amount

\$30,010.00

Cost Center Director

Treasurer/Controller

Date

4-14-80

C/C

THIS FORM MUST BE SUBMITTED TO CONTROLLER FOR ALL CHECKS

1120 Ashford Avenue San Juan, Puerto Rico 09071 (809) 725-8...

INVOICE TO:

INVOICE NO. 80-3-3 P

CARTER MONDALE PRESIDENTIAL COMMITTEE
S. LEE KLING, Treasurer

DATE: March 14, 1980

TV CAMPAIGN
PRESIDENTIAL PRIMARIES IN P.R.

WKAQ TV-CHANNEL 2

For the telecast of 30 seconds TV
spots within the following programs
& dates:

7PM Soap Opera on March 10, 11, 12,
13 (2); 14 (2) at \$825.00 each.
7 spots

\$ 5,775.00

BEST SELLERS on March 11 (2) at
\$450.00. 2 spots.

900.00

QUEST on March 11 (2) at \$400.00.
2 spots.

800.00

CHAPULIN COLORADO on March 11 at
\$675.00.

675.00

10PM News on March 11 (2); & March
14 (2). 4 spots.

1,300.00

10PM News on March 15 at \$125.00.

125.00

ROCKFORD FILES on March 12 (2) at
\$400.00 each.

800.00

6PM News on March 12, 13, 14 at
\$375.00. 2 spots.

750.00

HAWAII-FIVE-0 on March 13 (2) at
\$400.00. 2 spots.

800.00

FRIDAY MOVIES on March 14 at \$450.00.

450.00

SATURDAY SHOW on March 15 at \$400.00.

400.00

THE BEST FROM HOLLYWOOD on March 15
at \$350.00.

350.00

Total WKAQ

\$ 13,125.00

84040482101

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8111

INVOICE TO:

INVOICE NO. 80-3-3 P

CARTER MONDALE PRESIDENTIAL COMMITTEE

DATE:

- 2 -

WAPA TV-CHANNEL 4

For the telecast of 30 seconds TV
spots within the following programs
& dates:

6PM News on March 10 (2), 11 (2),
12 (2), 13 (2), 14 (2) at \$450.00
each. 10 spots. \$ 4,500.00

11PM News on March 10 (2), 11 (2),
12 (2), 13 (2), 14 (2) at \$300.00
each. 10 spots. 3,000.00

POLICE WOMAN on March 11 at \$350.00. 350.00

TUESDAY SHOW on March 11 (1) at
\$550.00 550.00

BARNABY JONES on March 12 (1) at
\$350.00. 350.00

UFO On March 12 at \$590.00. 590.00

CHARLIE'S ANGELS on March 12 at
\$620.00. 620.00

MILLION DOLLAR MAN on March 14 at
\$420.00. 420.00

RICH MAN, POOR MAN on March 14 at
\$350.00. 350.00

Total WAPA \$ 10,730.00

Total TV \$ 23,855.00

PRODUCTION

For the production of a 30 seconds TV
spot in VTR process featuring President

INVOICE TO:
CARTER MONDALE PRESIDENTIAL COMMITTEE

INVOICE NO. 80-3-3 P

DATE:

- 3 -

Carter & Governor Romero Barcelo
including announcer, editing, &
copies in VTR.

\$ 2,475.00

total Prod.

\$ 2,475.00

TOTAL

\$26,330.00

ADDITIONAL TV SPOTS

WAPA TV

1-30 seconds TV spots within Don
Cholito at \$155.00 on March 14/80.

155.00

1-30 seconds TV spot on 11PM News
on March 15/80 at \$200.00.

200.00

WKAQ TV

1-30 seconds TV spot within 7PM
Soap Opera on March 14, 1980 at
\$825.00.

825.00

Total WAPA y
WKAQ

\$ 1,180.00

TOTAL

\$27,510.00

RMA M. GOMEZ

84040482103

1120 Ashford Avenue, San Juan, Puerto Rico 00907 (809) 725-8111

INVOICE TO:

INVOICE NO. 80-3-4

CARTER MONDALE PRESIDENTIAL COMMITTEE
S. LEE KLING, Treasurer

DATE: March 14, 1980

WAPA TV-CHANNEL 4

For the transmission of a half
hour program (6:-6:30PM) on Saturday
March 15/80 with the Governor & Chip
Carter.

\$ 2,000.00

Production of VTR.

500.00

TOTAL

\$ 2,500.00

84040482104

Irma M. Gomez
IRMA M. GOMEZ

Approved CMPC
Edward D. Delle
National Finance Chairman
3/14/80

CARTER-MONDALE PRESIDENTIAL
COMMITTEE, INC.
OPERATING ACCOUNT

8473

July 24, 19 80

15-720
540

876.64

\$3,895,000.00

PAY
TO THE ORDER OF

Joe Franco & Associates
1120 Ashford Ave.
San Juan, Puerto Rico 00907

NON NEGOTIABLE

DETACH AND RETAIN THIS STATEMENT

THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW

IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED

DATE	DESCRIPTION	AMOUNT
7-24-80	Media/Space Time - Production (PR.)	876.64 540.00

CARTER-MONDALE PRESIDENTIAL COMMITTEE, INC.
OPERATING ACCOUNT

DOCUMENTATION:

Purchase Order Attached _____

Invoice Attached _____

Cost Estimate Attached _____

Order Form Attached _____

Proposal Attached _____

Agreement/Contract Attached _____

Receipts Attached _____

(Do Not Write Below This Line - For Approval Purposes Only)

Maddeline Phipps
Joe Franco
Center Director

Date _____

Amount \$10,101.00

Date _____

C/C _____

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-84...

INVOICE TO:

C ARTER MONDALE COMMITTEE
C/O SR. ANGEL VIERA
SAN JUAN, P.R.

INVOICE NO. 80-1-18 P

DATE: 1/31/80

TEMPO CREATIVE SERVICES, INC. (Factura 80-1-26)

Por arte e impresión de 3,000 hojas para cubiertas
de alcancía Radio Maratón...

\$ 136.00

TEMPO SOUND STUDIOS (Factura 80-1-125)

Por tiempo de grabación, mezcla y master
de cuña Radio Maratón Carter-Mondale.

180.00

TEMPO SOUND STUDIOS (Factura 80-1-124)

Por grabación de cuña de 30 segundos,
estudio, 6 cartridges y 40-8 track cartridges.

560.00

TOTAL \$ 876.00

IRMA M. GOMEZ

Irma M. Gomez

84040482106

IRMA M. GOMEZ

1120 Ashford Avenue / San Juan, Puerto Rico 00901 / (609) 755-1111

INVOICE TO:

INVOICE NO. 80-3-2 P

CARTER MONDALE PRESIDENTIAL COMMITTEE INC.
S. LEE KLING, Treasurer

DATE: March 14, 1980

NO

For 6 hours radio broadcast of
last minutes instructions to
voters participating in the Sunday,
March 16, 1980 Democratic Primary;
over the following radio stations.

WUNO, SAN JUAN	\$ 1,800.00
WZOL, LUQUILLO	600.00
WMDD, FAJARDO	900.00
WNEL, CAGUAS	825.00
WNIK, ARECIBO	600.00
WCPR, COAMO	750.00
WUNA, AGUADILLA	600.00
WPRA, MAYAGUEZ	600.00
WZAR-FM, PONCE	1,250.00
WLEO, PONCE	900.00
Remote facilities charges	400.00
TOTAL	\$ 9,225.00

84040482103
Irma M. Gomez
IRMA M. GOMEZ

MELÉNDEZ, REY & RODRÍGUEZ-BIGAS

EDIFICIO EL CARIBE, PISO 14
AVENIDA LAS PALMERAS
SAN JUAN, PUERTO RICO

ERNESTO A. MELÉNDEZ-PÉREZ
JOSÉ ANGELO REY
LUIS RODRÍGUEZ-BIGAS

TEL. (809) 725-8484

APARTADO 8072
OFICINA POSTAL GENERAL
SAN JUAN, PUERTO RICO 00986

August 11, 1980

Mr. Evan S. Dobelle
National Finance Chairman
Carter/Mondale Presidential
Committee, Inc.
P. O. Box 500
Washington, D. C. 20044

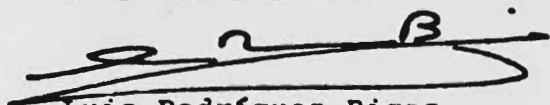
Dear Mr. Dobelle:

Joe Franco & Associates, Inc. has referred to us for collection an account owed by the Carter/Mondale Presidential Committee, Inc. in the amount of \$33,614.50 for advertising services rendered in relation to the Presidential primaries held in Puerto Rico on March 16, 1980.

Before commencing any legal action, we give you this opportunity of paying balance due and thereby avoid the inconveniences and expenses of a judicial proceeding.

Unless we receive your check within the next 15 days from the date hereof, we shall have no alternative but to file the corresponding complaint for the collection of the balance due.

Very truly yours,


Luis Rodríguez Bigas

LRB/nm

84040482109

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CARTER MONDALE COMMITTEE
BOX 2483
SAN JUAN, P.R. 00963

INVOICE NO. 80-2-44 P

DATE: Feb. 29, 1980

INAUGURACION OFICINAS CENTRALES COMITE CARTER-MONDALE

RADIO

WUNO RADIO (Fact. 66)

Por concepto de transmisión de remoto
de 3 1/2 horas de duración en feb. 9/80. \$ 1,225.00

WXRF RADIO (Fact. 223467)

Por concepto de 3 1/2 horas de trans-
misión en feb. 9/80. 450.00

WALO RADIO-HUMACAO (Fact. 2-80-305)

Por concepto de 3 horas de transmisión
en feb. 9, 1980. 300.00

WTIL-MAYAGUEZ (Fact. 2-9-80)

Por concepto de 2 horas de transmisión
en feb. 9, 1980. 255.00

WCMN-ARECIBO (Fact. 41650)

Por concepto de 3 horas de transmisión
en feb. 9, 1980. 360.00

WNEL-CAGUAS (Fact. 1184)

Por concepto de 3 horas transmisión en
feb. 9/80. 450.00

WUPR-UTUADO (Fact. 80-2-120 (2))

Por concepto de 3 1/2 horas de transmi-
sión en feb. 9/80. 360.00

WZAR-PONCE (Fact. 2-83)

Por concepto de 3 1/2 horas de transmi-
sión en feb. 9/80. 750.00

WLEO-PONCE (Fact. 2-0069)

Por concepto de 3 1/2 horas de transmi-
sión en feb. 9/80. 450.00

INVOICE TO:
CARTER MONDALE COMMITTEE

INVOICE NO. 80-2-44 P

DATE:

- 2 -

WKAQ RADIO (Fact. 2211-01)
Por concepto de 20 cuñas de Radio de
30 segundos transmitidas local y sábado
en feb. 8,9, 1980.

\$ 360.00

WUNO RADIO (Fact. 66)
Por concepto de 20 cuñas de Radio de 30
segundos transmitidas durante el día en
feb. 8,9, 1980.

360.00

Total Radio \$ 5,320.00

PRENSA

EL NUEVO DIA (Fact. 020327)
Por concepto de 1 anuncio de 30 pulgadas
publicado en feb. 9, 1980. (Hoy sábado)

510.00

NATIONAL TYPESETTING SERVICES
Por concepto de tipografía para anuncio
de prensa publicado en El Nuevo Día en
feb. 9, 1980.

15.00

TEMPO CREATIVE SERVICES (Fact. 80-2-54)
Por concepto de arte y 1 negativo línea
de 30 pulgadas para anuncio de prensa
publicado en feb. 9, 1980 en El Nuevo
Día.

166.00

IMPRESOS

TEMPO CREATIVE SERVICES (Fact. 80-2-134)
Por concepto impresión y arte para 1,000
papel carta y 1,000 sobres.

110.00

1120 Ashford Ave. ---

INVOICE TO:
CARTER MONDALE COMMITTEE

INVOICE NO. 80-2-44 P

DATE:

- 3 -

MISCELANEOS

MFM STATIONERY

Por 7 numeradoras para enumerar sobres
y 6 pads de tinta.

\$ 285.50

ALMACENES RIGUAL

Por 4 doz. sombreros Pra-Pra.

36.00

Total Prensa,
Impresos y
Misc.

\$ 1,122.50

T O T A L

\$ 6,442.50

IRMA M. GOMEZ

Irma M. Gomez

34040482112

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CARTER MONDALE COMMITTEE
C/O LCDO. ANGEL VIERA MARTINEZ
SAN JUAN, P.R.

INVOICE NO. 80-2-19 P

DATE: Feb. 28, 1980

CONVOCATORIA A DEMOCRATAS CON JIMMY CARTER

EL NUEVO DIA (Factura 020039)

Por concepto de 1 anuncio de 30
pulgadas publicado en feb. 2, 1980.

\$ 510.00

EL VOCERO (Factura 41566)

Por concepto de 1 anuncio de 30
pulgadas publicado en feb. 1, 1980.

450.00

THE SAN JUAN STAR (Factura 056198)

Por concepto de 1 anuncio de 30
pulgadas publicado en feb. 1, 1980.
("Invitation to all Democrats...")

420.00

NATIONAL TYPESETTING SERVICES

Por concepto de tipografía para
anuncio de prensa publicado en
El Nuevo Día, El Vocero y The San
Juan Star en feb. 1,2, 1980.

20.00

TEMPO CREATIVE SERVICES, INC. (Fact. 80-2-57)

Por concepto de arte y 3 negativos
línea de 30 pulgadas para anuncio
de prensa publicado en El Nuevo Día,
El Vocero y The San Juan Star en feb.
1,2, 1980.

250.00

TOTAL

\$ 1,650.00

Irma M. Gomez
IRMA M. GOMEZ

JOE FRANCO & ASSOCIATES Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

CARTER MONDALE COMMITTEE
BOX 2483
SAN JUAN, P.R. 00963

INVOICE NO. 80-2-43 P

DATE: Feb. 29, 1980

PROMOCION CAUCUS DEMOCRATAS EN 2/10/80

RADIO

WKAQ RADIO (Fact. 2155-03)

Por concepto de 16 cuñas de Radio de
30 segundos transmitidas en Radio Reloj
AM en feb. 6 al 9, 1980. (48 cuñas bono) \$ 976.00

WKAQ RADIO (Fact. 2156-04)

Por concepto de 4 cuñas de Radio de 30
segundos transmitidas en Radio Reloj
AM en feb. 6 al 9, 1980. (12 cuñas bono) 244.00

WKAQ RADIO (Fact. 2154-04)

Por concepto de 4 cuñas de Radio de 30
segundos transmitidas en Radio Reloj AM
en feb. 6 al 9, 1980. 244.00

WKAQ RADIO (Fact. 2153-04)

Por concepto de 4 cuñas de Radio de 30
segundos transmitidas en Radio Reloj AM
en feb. 6 al 9, 1980. 244.00

WLEO RADIO (Fact. 02-0019)

Por concepto de 40 cuñas de Radio de 30
segundos transmitidas en feb. 6 al 9,
1980. 200.00

WPRP-PONCE (Fact. 2-5)

Por concepto de 40 cuñas de Radio de 30
segundos transmitidas en feb. 6 al 9,
1980 a \$5.50 c/u. 220.00

WEUC-PONCE (Fact. 3533)

Por concepto de 40 cuñas de Radio de 30
segundos transmitidas en feb. 6 al 9,
1980 a \$4.40 c/u. 176.00

FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

CARTER MONDALE COMMITTEE

INVOICE NO. 80-2-43 P

DATE:

- 2 -

Wael-MAYAGUEZ (Fact. 22357)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$4.50.

\$ 180.00

WORA-MAYAGUEZ (Fact. 2-21)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$7.00 c/u.

280.00

WUNA-AGUADILLA (Fact. 2-F)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$3.50 c/u.

140.00

WMIA-ARECIBO (Fact. 80-124)

Por concepto de 51 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$1.70 c/u.

120.00

WCMN-ARECIBO (Fact. 41639)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$4.00 c/u.

160.00

WEGA-VEGA BAJA (Fact. 4755)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980.

150.00

WALO-HUMACAO (Fact. 80-2111)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$5.00 c/u.

200.00

WNEL-CAGUAS (Fact. 1185)

Por concepto de 40 cuñas de Radio de 30

FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-E

INVOICE TO:

INVOICE NO. 80-2-4:

CARTER MONDALE COMMITTEE

DATE:

- 3 -

segundos transmitidas en feb. 6 al 9,
1980 a \$6.00 c/u.

\$ 240.00

WXRF-GUAYAMA (Fact. 80-2-113)

Por concepto de 30 cuñas de Radio de 30
segundos transmitidas en feb. 7 al 9,
1980.

180.00

Total RAdio \$ 3,954.0

PRODUCCION RADIO

HECTOR TRAVIESO/LOCUTOR

Por locución en 9 cuñas de 30 segundos.
Package.

450.00

RAUL ROSADO/LOCUTOR

Por locución en 9 cuñas de 30 segundos.
Package.

450.00

TEMPO SOUND (Fact. 80-1-16, 21, 23)

Por concepto de grabación en estudio,
mixing y 16 cartridges.

570.00

Total Prod. 1,470.00

PRENSA

EL NUEVO DIA (Fact. 020331)

Por concepto de 1 anuncio de 30 pulgadas
publicado en feb. 7 y 8, 1980. (Este
próximo domingo...)

1,920.00

EL VOCERO (Fact. 41709)

Por concepto de 1 anuncio de 30 pulgadas
publicado en feb. 7 y 8, 1980. (Este
próximo domingo...)

900.00

84040482116

TRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-2-43 P

CARTER MONDALE COMMITTEE

DATE:

- 4 -

THE SAN JUAN STAR (Fact. 065105)
Por concepto de 1 anuncio de 30 pulgadas
publicado en feb. 9, 1980.

\$ 420.00

Total Prensa \$ 2,340.00

PRODUCCION PRENSA

NATIONAL TYPESETTING SERVICES

Por tipografía para anuncio de prensa
publicado en feb. 7,8,9, 1980 en El
Nuevo Día, El Vocero y The San Juan Star.

25.00

TEMPO CREATIVE SERVICES (Fact. 80-2-55, 61)

Por concepto de arte y 2 negativos línea
para anuncio de prensa de 30 pulgadas pu-
blicado en 3 periódicos en español e inglés,
en feb. 7,8,9, 1980.

332.00

Total Prod. 357.00

TOTAL \$ 8,121.00

Irma M. Gomez
IRMA M. GOMEZ



FEDERAL ELECTION COMMISSION

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

THIS IS THE BEGINNING OF MUR #

1354

Date Filmed 10/18/84 Camera No. --- 7

Cameraman JRL

84040482118



FEDERAL ELECTION COMMISSION

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

84040482119

THIS IS THE END OF OUR # Depositions 1354

Date Filmed 10/18/84 Camera No. 1

Cameraman JRL

1 BEFORE THE FEDERAL ELECTION COMMISSION

2
3
4 In the Matter Of:

5 Comite Amigos De Jimmy Carter : MUR 1354
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Deposition of:

11 ADALBERTO JURADO ORTA

13 The deposition of Adalberto Jurado Orta was held
14 before Olivia D. Gittens, Court Reporter, on the 26th
15 of October, 1982, at the Office of the United States
16 Attorney, Federal Office Building, Hato Rey, Puerto Rico.
17
18
19
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25

APPEARANCES

THOMAS J. WHITEHEAD, ESQ.
SUSAN CALLAHAN

Representing The Federal Election Commission.

RAYMOND McCONNIE
Interpreter

JUAN OSVALDO RODRIGUEZ LOPEZ, ESQ.
Notary Public

(Interpreter and deponent
duly sworn.)

MR. WHITEHEAD: Would the translator identify
himself for the record, please.

THE INTERPRETER: Raymond J. McConnie,
interpreter/translator.

MR. WHITEHEAD: Address?

THE INTERPRETER: Park Boulevard, 2162
Ocean Park, Santurce.

Whereupon:

A D A L B E R T O J U R A D O O R T A,
having been first duly sworn, was examined and testified
upon his oath, through an interpreter, as follows:

DIRECT EXAMINATION

BY MR. WHITEHEAD:

Q Mr. Jurado, would you state your name for
the record, please?

A Adalberto Jurado Orta.

Q And your address?

A Genova A-12, Villa Caparra, Guaynabo, Puerto
Rico, 00657.

MR. WHITEHEAD: Off the record.

ARTHUR G. PINEDA, INC.

STENOTYPE REPORTING
(809) 784-8912 - 795-0556

(Off the record.)

BY MR. WHITEHEAD: (resuming)

Q Could you tell us your business and your business address?

A I am a factory representative, Industrial Products, and the same address like my residence.

Q Mr. Jurado, you are here today without legal counsel; is that correct?

A Yes.

Q And are you here today under a subpoena from the Federal Election Commission?

A Yes, sir.

Q Have you discussed the subpoena in this case with anyone at all?

A No.

Q Mr. Jurado, are you familiar with the Comité Amigos de Jimmy Carter?

A Yes; Treasurer.

Q And can you tell us how you became familiar with the Comité Amigos?

A I am going to answer you in Spanish.

This was a group of friends of Jimmy Carter, or rather sympathizers of Jimmy Carter that came together to help to raise funds for the campaign.

1
2 Q And when did you first get involved with
3 this group of individuals of whom you testified?

4 A You want the date, specifically ?

5 Q Please.

6 A Well, it was in February, before the
7 primaries.

8 Q Is it not a fact that the primary was held
9 on March 16th?

10 A Right.

11 Q 1980?

12 A And we organized the Comite in February 1st--
13 no, March 1st.

14 Q The 1st of March?

15 A Well, two weeks before the election--the
16 primary.

17 Q What position did you hold with the Comite
18 Amigos?

19 A Treasurer.

20 MR. WHITEHEAD: I am going to mark this
21 FEC Exhibit 1.

22 (The above-mentioned document
23 was marked as FEC Exhibit No. 1)
24
25

1
2 BY MR. WHITEHEAD: (resuming)

3 Q Mr. Jurado, I show you what has been marked
4 for identification as FEC Exhibit 1, which is a copy of
5 a statement of organization for a political committee, for
6 the Comite Amigos de Jimmy Carter, on the FEC form, and
7 bears on the last page what purports to be your signature,
8 and a date of February 19th, 1980.

9 And I ask you if you are familiar with that
10 document?

11 A Yes.

12 Q Is that your signature?

13 A Yes, that's my signature.

14 Q Is that a copy of the statement of
15 organization you filed in Washington?

16 A That's right. Yes.

17 Q The date on that is February 19th, 1980.

18 Does that refresh your recollection as to when
19 this committee was formed?

20 A Yes. That's the date. We got together and
21 formed the committee.

22 Q So, it was not March 1st?

23 A Well, we started March 1st, after this.

24 Q You started your activities?

25 A Right. That's what I mean, the activities.

1
2 Because it would take about ten days or two
3 weeks to organize.

4 Q All right.

5 As the treasurer of the Comite, what were your
6 duties?

7 A Well, my duties was--the best I can tell you
8 about my duties was a group we looked for, you know, social
9 activities and sell tickets, you know, some things like that
10 to raise money for the campaign, together with the other
11 people, like the president of the Comite and the other two
12 people.

13 Q Let me ask you this.

14 Did you file the necessary forms with the Federal
15 Election Commission as the treasurer for Comite Amigos?

16 A I think I--we filled out something.

17 Q You say "we," who else?

18 A Well, the president and me, we get together.

19 Q All right.

20 The president is listed as Manuel Perez Rodriguez.

21 A Right.

22 Q What is your association with Mr. Perez
23 Rodriguez, outside of this committee?

24 A Social only. Friends. And we sympathize--I
25

mean with the same ideas, you know.

Q Are you both members of the Democratic Party, for example?

A Well, we are members of the local--like we call it Nuevo Progrestitas.

THE INTERPRETER: "New Progressive Party."

THE DEPONENT: That's right.

BY MR. WHITEHEAD: (resuming)

Q How about Julio Juan Garcia?

A Julio...?

Q Juan Garcia; who is mentioned as the vice-president.

A Oh, that's right. Yes. Yes. That's just to fill up the--you know, the paper, because he was not active.

Q How about Antonio Alfonso?

A Yes, he was the--

Q Secretary?

A Secretary. Yes, the secretary.

He died.

Q He what?

A He died in an accident about a year ago.

Q Was either Mr. Juan Garcia or Antonio Alfonso active with the Comite?

1
2
3 Did they do things with the Comite?

4 A Well, just a little bit; not too much.

5 We'd get together once in a while, maybe two or
6 three times, and we talked about different things, like the
7 things we had to do and--

8 Q Did you have the authority to sign checks for
9 the Comite?

10 A Yes; with Rodriguez.

11 Q You had to have two signatures on the checks?

12 A Two signatures, right.

13 Q Did you sign all checks that were paid to
14 Joe Franco & Associates?

15 A Yes.

16 Q Now, how did you come to pay these things?
17 Were you presented with an invoice from Joe Franco
18 and you paid him that amount as the treasurer?

19 A Right.

20 Q Did you get all of the Franco invoices to
21 the Comite Amigos? Did they come to you or to Mr. Rodriguez?

22 A Well, it is sent to me all the time, and the
23 same thing, the both. We worked together, you know, Mr.
24 Rodriguez and me. We handled both.

25 Q We have had testimony this morning from Mr.

1
2 Joe Franco that a meeting was held in Viera Martinez's
3 office in the State Capitol on February 18th, 1980, and
4 that Mr. Franco was present, Mr. Viera Martinez was present,
5 Mr. Evans Dovelie was present; Mr. Terry O'Connell was
6 present, Buddy James was present, and another lawyer was
7 present, whose name he could not recall.

8 He testified that during the course of that
9 meeting you were telephoned by Mr. Viera Martinez and
10 you came to that meeting.

11 Are you familiar with that meeting?

12 A No, no, sir.

13 They called me and they said they are going to
14 name me treasurer.

15 Q Who called you?

16 A From the office of Viera Martinez, but I
17 was never in there, in that meeting. That's the truth.

18 It was a surprise for me, because I never was
19 over there. I don't know Mr. O'Connell and the other people
20 that were involved. The secretary called.

21 Q Did you talk with anyone besides a secretary
22 that evening?

23 A No.

24 Q And what did the secretary say to you?
25

1
2 A That in that moment they named--they mentioned
3 my name. If I accept to be treasurer of the Amigos de
4 Jimmy Carter.

5 I don't know nothing about that. I told them I
6 had to think about that. And then I answered, two or
7 three days after that.

8 Q Who did you answer to?

9 A Well, I called to the office of Viera
10 Martinez and I spoke with the secretary.

11 Q Did you talk with Mr. Viera Martinez at all?

12 A I think so. I spoke with him.

13 She transferred the telephone call to him.

14 Q What was said during that conversation?

15 A If I am in the position of accepting the
16 position of treasurer.

17 I told them yes, it's no problem, I can accept.

18 Q You can accept?

19 A I'd be able to do it.

20 Q Okay. Did he mention Mr. Rodriguez during
21 that conversation?

22 A I can't remember. I think so. I think so,
23 yes.

24 Q Did you ask him who else would be on the
25 Comite Amigos de Jimmy Carter during that conversation?

1
2 A No. They sent me a letter after that, a
3 letter--I can't remember--a memo. It was a memo telling
4 me all the people who was involved over there; if I am
5 in accordance with them, if we have to get together.

6 And then I accepted the position.

7 Q Do you recall whose names were on that
8 letter, or that memorandum?

9 A I can't remember.

10 Q Do you have a copy of that letter or that
11 memorandum?

12 A No, it was a piece of paper, you know.

13 Q Was it from Viera Martinez?

14 A From the office.

15 Q Was it signed by him; do you recall?

16 A No.

17 Q Who was the secretary that you dealt with
18 in his office? Do you remember?

19 A Well, he has about three or four ladies
20 working over there. I remember it was--she is not working
21 anymore over there. She got in an accident and I think they
22 shot him in the street--do you remember the accident that
23 was in front of the Capitol?

24 Q They shot Viera Martinez?

25 A No, the lady.

1
2 Q They shot the lady.

3 You said him.

4 MS. CALLAHAN: The secretary.

5 THE DEPONENT: Somebody tried to steal her
6 car in front of the Capitol, about six or seven
7 months after--before the election, before November.

8
9 BY MR. WHITEHEAD: (resuming)

10 Q So--

11 A I can't remember her name.

12 Q Were you asked by Mr. Viera Martinez or by
13 his secretary, whomever--

14 A Yes.

15 Q --were you asked to contact Mr. Rodriguez?

16 A No.

17 Q All right.

18 Were you asked to contact Mr. Julio Juan Garcia?

19 A No.

20 Q Were you asked to contact Antonio Alfonso?

21 A No.

22 Q To your knowledge, who contacted Rodriguez,
23 Garcia and Alfonso?

24 A Well, I think it was from the office of
25 Viera. I don't know who, because we are all the same group,

1
2 you know. But I can't remember who called them to name
3 them.

4 Q Have you been a life-long friend of Viera
5 Martinez?

6 A Yes, for many years.

7 Q For how many years would you say that would
8 be?

9 A I would say about twelve, fourteen years.
10 Since he started in the political business.

11 Q Did you live nearby or something?

12 A No.

13 Q Did you live near him?

14 A No. No, he lived in the Condado. I live
15 over here in Caparra, the other way.

16 Q Was he a social acquaintance of yours?

17 A Oh, yes. We'd get together, you know, at
18 least once a month. Every time they have some activity
19 in the political party.

20 Q I see.

21 Would you say it was Mr. Viera Martinez's idea
22 to form the Comite Amigos?

23 A Well, yes. One group of the Democratic
24 Party and in San Juan.

25 Q But my question is, was it--

1
2
3 A His idea?

4 Q His idea; Viera Martinez?

5 A Yes. One group from the Democratic Party.

6 Q But who came first?

7 A Viera.

8 Q Viera Martinez?

9 A Viera Martinez, because he is the--I think
10 he is the delegate or something of the Democratic Party
11 in Puerto Rico; chairman of the Democratic Party.

12 That's the name; chairman.

13 Q All right.

14 Now, did you ever have any previous political
15 background, aside from just being a member of the Democratic
16 Party?

17 A Well, yes.

18 Q What was that?

19 A Well, working with the New Progressive Party,
20 with Romero Barcelo, the governor.

21 Q Right.

22 A And other politics.

23 Q What did you do? Volunteer work?

24 A Volunteer work, yes.

25 Q Fund raising?

1
2 A Well, campaigns, yes. Fund raising and
3 campaigns.

4 Q Right. All right.

5 Are you familiar with the term independent
6 expenditures under the Federal Election Law?

7 A No.

8 Q You do not know?

9 A No.

10 Q Garcia has claimed that he has never been
11 an officer of Comite Amigos.

12 Can you explain that at all?

13 Do you have any explanation?

14 A Well, he just--to fill up the name of the
15 vice-president of the--

16 Q Did he know his name was going on here, is
17 what I am saying?

18 A Yes.

19 Q He did?

20 A Yes.

21 Q How did he know.

22 A I think they sent a letter to him.

23 Q Who is "they?"

24 A The Democratic people.

25 Q Who was that?

1
2
3 A Viera Martinez.

4 Q Viera Martinez?

5 A Viera Martinez.

6 Q To your knowledge, Viera Martinez sent a
7 letter to Garcia; is that right?

8 A Yes. He names these people. He recommended
9 the people for that, like Alfonso and me and the other,
10 Rodriguez.

11 Q Returning to FEC Exhibit 1, who did the
12 typing, who prepared the typing for the statement of
13 organization?

14 A The statement of organization?

15 Q This exhibit. Who typed this information?

16 A I can't recall who did that. That was about
17 two years ago, two and a half years ago. I can't remember.

18 Q Did you do the typing?

19 A Let me see if it's my typewriter.

20 No, we did it in the office. I remember now, in
21 the office of Rodriguez.

22 Q In Rodriguez's office?

23 A The office, yes.

24 Q Who was present in Rodriguez's office?

25 A I think his secretary, him and me.

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Q The three of you?

A The three.

Q Where did you get the other names? Did you have somebody hand you those names or did you have a piece of paper with them on there?

A All the other names, over here.

Q Except yours and Rodriguez?

A Yes. Yes, we have the other names on a piece of paper.

Q Who gave you that piece of paper?

A From the office of Viera Martinez.

Q That's where you got it?

A I know all the other people.

Q You know them, but you still get the information from Viera Martinez's office?

A Oh, yes, because I don't know if the other people can handle this. Too many people they don't accept; they don't want to accept.

Q You didn't contact the other names on there to see if they would accept or not?

A Well, except Antonio Alfonso; he was a very good friend of mine.

Q But did you call him and say, will you be on the committee?

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1
2 A Yes. I think I called him, if he wanted to
3 be the secretary. He told me, well, it's no problem to be
4 the secretary.

5 Q How about the other names?

6 A Well, the others, no.

7 Q That was on Viera Martinez's letter?

8 A Right; note.

9 Q Okay. Could you tell us how Comite Amigos
10 raised its funds?

11 A Well, we raised the funds--we got a small
12 place, we rented.

13 Q Where?

14 A In Munoz Rivera.

15 Q Who else was in that building?

16 A No, there was no building. That's a piece
17 of land, and we built, you know, like a tent, and we make--
18 some music. We rent some music and we buy some food and
19 we sell it over there and then we charged for that.

20 Q Who owns that land?

21 A I can't remember now, because that was a
22 fellow that they rent to us for--I believe for a couple of
23 hundred dollars, or something like that.

24 I can't remember the name of the owner of the
25 place. I think it's Gonzalez, or something like that.

1
2 Q Was the Carter-Mondale Presidential Committee
3 also in that location?

4 A It was a building very close to that piece
5 of land, but that's not the same place. It was different.
6 We don't have access to the Carter-Mondale Committee.

7 Q Were they on the same street?

8 A Well, yes, the same street.

9 Q The same street.

10 A And we had the office of the Amigos de Jimmy
11 Carter on Ponce de Leon Street, and Munoz Rivera is the
12 continuation of Ponce de Leon; changed the name over there.

13 MR. WHITEHEAD: Off the record.

14 (Off the record.)

15
16 BY MR. WHITEHEAD: (resuming)

17 Q Did you rent any--Comite Amigos, did you rent
18 any office space?

19 A Yes, we had Muebleria Olmedo in Santurce,
20 Ponce de Leon. And we don't rent; they give to us, you
21 know.

22 Q Who is "they?"

23 THE INTERPRETER: That's a furniture store.

24 BY MR. WHITEHEAD: (resuming)

25 Q Who owns that building?

ARTHUR G. PINEDA, INC.

STENOTYPE REPORTING
(809) 784-8912 - 785-0556

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1
2 A Mr. Olmedo.

3 Q Did you ever occupy any space in the building
4 owned by--you, I mean Comite Amigos, did you ever occupy
5 a space in that building owned by Viera Martinez?

6 A In that building?

7 Q Any building.

8 A No.

9 Q No?

10 A No. After the election we needed to raise
11 some funds to pay the account we owed Mr. Franco and we
12 organized an activity that was--this was after, it was a
13 different activity, you know, to raise funds to pay.

14 And it was his idea, Joe Franco's idea, to raise
15 some money because we owed a lot of money to him.

16 Q All right.

17 Did you have any paid employees of the Comite
18 Amigos?

19 A No.

20 Q They were all volunteers?

21 A All volunteers. No, not paid.

22 Q How did you select the volunteers? How did
23 you come to find these volunteers?

24 A Well, people from the New Progressive Party.
25 The same people, the New Progressive Party, you know, the

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1
2 ones in the election and for the primaries, and they went
3 out looking for, you know, cooperation from the people from
4 the New Progressive Party, from the Democratic people.

5 Q I see.

6 Did you have a permanent staff at the Comité
7 Amigos headquarters?

8 Did you have somebody there all the time?

9 A Yes--no, we changed people. All the people,
10 you can't take them all the time to do the same thing, you
11 know.

12 Q You have indicated in a letter to us of
13 May 15th, 1981 that Comité Amigos raised their money through
14 nickles, dimes, quarters and dollar bills and radio marathons
15 and can collections.

16 A Correct.

17 Q Who developed the idea for this fund raising,
18 these activities?

19 A Perez and me.

20 Q These were your ideas?

21 A Yes.

22 Q And Perez Rodríguez's?

23 A Yes. Perez Rodríguez and me. And we sent
24 the cans and all the things throughout the island to raise
25 money.

1
2 Q How about the radio marathon?

3 A The radio...?

4 Q Yes. The marathon.

5 A I rented the stations. We called to the
6 stations and we spoke with the stations and then we made
7 all the arrangements.

8 Q Did Joe Franco have anything to do with this?

9 A Oh, yes.

10 Q Was it his idea; the radio marathon, the
11 cans; or was it your idea?

12 A Between everybody.

13 Q Well, tell me about the meetings where these
14 ideas were formed.

15 Who was at these meetings?

16 A Joe Franco.

17 Q Who else?

18 A Well, I remember we got together in the
19 office of Joe Franco.

20 Q When?

21 A I think it was in March. Yes, it was in
22 March.

23 Q Early?

24 A Yes.

25 Q March 1st, 2nd?

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1
2 A A week or ten days. I can't remember. It
3 was between the 1st and the primary.

4 Q All right.

5 A We got together in the office of Joe Franco
6 and gave to him all the information that we needed to do
7 the promotion.

8 Q Who is 'we?' Who was there?

9 A For the first time, I was there and Mr.--I
10 can't remember his name.

11 I think Dovelie. Dovelie, O'Connell, Keefe, I
12 think. Bob Keefe.

13 Q All right.

14 A We got together. That's the first time I met
15 with them. I don't know.

16 Q How did you know--were you introduced to
17 Dovelie, O'Connell and Keefe?

18 A No.

19 Q Did somebody introduce you to them?

20 A No, this is Mr. Dovelie. That's it. That's
21 the first time.

22 Q Who did that? Was Viera Martinez there?

23 A I can't--no.

24 Q He was not there?

25 A It was Joe Franco, Keefe, Dovelie, Rodriguez

1
2 and myself.

3 Q Bob Keefe has told us in affidavits that
4 during the period in question he was never in Puerto Rico.

5 Could you be mistaken on Mr. Keefe?

6 A He says that he never was in Puerto Rico?

7 Q He says during the period in question--and
8 we're talking about the primary period--

9 A The primary period.

10 Q --March 16th and prior--

11 A Yes.

12 Q --that he was not in Puerto Rico.

13 Do you remember his name being used? Do you
14 remember being introduced to Bob Keefe?

15 A Well, about four people I think was there
16 from the Democratic Party, to get together with Joe Franco
17 and us and to discuss the campaign.

18 But I think he was there.

19 Q What does he look like; do you remember?

20 A I can't remember that.

21 Q What does Mr. O'Connell look like?

22 A I saw them once, only.

23 Q Mr. O'Connell, does he have a beard?

24 A Well, I know one's got something on the eye,
25 covers the eye--that's O'Connell. Right, that's O'Connell.

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1
2 Q What does Dovelie look like?

3 A I can't remember. I can't remember, because
4 I saw him only once. And that was for about ten or fifteen
5 minutes.

6 There was a lot of people over there, you know,
7 from the agency. But I can't remember.

8 If I see him--the other fellow, yeah, I saw him
9 many times, because he was in the newspaper over here and--

10 Q Who is that?

11 A They guy with the--

12 Q O'Connell?

13 A O'Connell, right.

14 Q All right.

15 Now, this meeting was held in Joe Franco's office?

16 A In Joe Franco's office.

17 Q And this is when you came up with the idea
18 of the radio marathon and the cans and dimes and dollars?

19 A Right.

20 Q For Comite Amigos?

21 A Yes.

22 Q Who was involved in the discussion?

23 A Joe Franco, Dovelie, O'Connell; two or three
24 more people. I think it was that fellow. I can't--Keefe, I
25 think was there. And the other fellow--I can't remember his

name now.

There was about ten people there.

Q Did that include staff that worked for Joe Franco?

A Yes.

Q All right.

How about Pena? Mr. Pena, was he there?

A Yeah, he handled all the business in Joe Franco's office.

Q How about Santiago; Efren Santiago?

A Joe Franco, he has about three or four people. I think--well, all his staff.

Q The staff was there.

A Yes.

Q Okay. How about Irma Gomez; do you remember her being there?

A No.

Q Okay. How about Louis Rodriguez Bigas?

A Bigas? I can't remember if he was there.
Bigas? Bigas?

Q No. Okay. That's all right.

Antonio Cordova Gonzalez?

A I can't remember if he was there.

Q Okay.

1
2 A There was a lot of people there, but I
3 can't remember.

4 That belongs to Joe Franco & Associates?

5 Q No, no. These are just names that--

6 A No, no, because I know a lot of people over
7 there, but it doesn't sound to me like they work for him.

8 Q No, these were attorneys, a couple of
9 attorneys whose names have come up. No, they're not members
10 of Franco's staff.

11 Pena, yes.

12 A Pena, yes. Pena.

13 Q All right.

14 How long did the meeting last?

15 A I'd say we discussed over there--we saw some
16 pictures and videotapes and other things, you know, for the--
17 I can't remember if they showed--I think it was about an
18 hour and a half, something like that. I can't remember
19 exactly how much time we spent over there.

20 Q Do you remember who called you to tell you
21 to come over to the meeting?

22 A Joe Franco.

23 Q Joe Franco did?

24 A Yeah, we were talking before with Joe Franco
25 to get together and make all the arrangements for the radio

1
2 and television and all the propaganda, you know.

3 Q Did Dovelie--I'll take them in turn.

4 Did Dovelie take an active part in the discussion
5 about the committee's advertising, Comite Amigos?

6 A Not exactly, because the thing was to get
7 together, the most we can do, cooperation, you know, and
8 the advertisement.

9 Q No. My question is: you came up with the
10 ideas of the cans and the radio marathons.

11 A Yes.

12 Q What I'm saying is, did Mr. Dovelie, Mr.
13 O'Connell, Mr. Keefe, take an active part in coming up
14 with these ideas about the cans and the radio marathons?

15 A No, no, I don't think so. That was Joe
16 Franco's idea.

17 Q Then did they stay--let me try to make this
18 as close as I can.

19 When the discussion centered on the cans and the
20 radio marathons, did they walk away or did they stay in
21 there or did they talk or what?

22 A No, they don't say nothing. I can't remember--
23 the only thing I can remember--I can't remember who was in
24 there, who was present at that time.

25 They don't say nothing because they don't know the

1
2 way we work over here with the marathons and the radio and
3 the cans and the collections; looking for money from the
4 people, you know. It's worked different than the states.

5 Q All right.

6 But did they just sit and listen? Did they...?

7 A Well, they--I left the office of Joe Franco,
8 I think before them, a long time before them. I don't know
9 after that what happened over there.

10 Q But they were there while you were there?

11 A Yes.

12 Q They were there.

13 Was it you, Rodriguez and Franco talking about
14 the cans and the marathons?

15 A Right. Right. They don't say nothing about
16 that.

17 Q But they heard it? They were there?

18 A Yes.

19 Q They were sitting at the table or in the
20 room?

21 A Yes. Well, to my knowledge--but my knowledge
22 is that I mentioned in the letter.

23 Q Was this in Joe Franco's upstairs--Mr. Jurado?

24 A Yes?

25 Q Was this meeting upstairs in his main office

1
2 where they have the video screen and--on the fifth floor?
3 Is that where we're talking about?

4 A No, no, no. At that time he don't got the
5 fifth floor; he got only the second floor.

6 Q Okay.

7 A I think it was the second and--no, no, they
8 got two more floors, but not the fifth floor.

9 Q Okay. Did he show any film clips or any
10 radio advertisements or any newspaper advertisements to you
11 at that time?

12 A No. He made some drafts, you know, of the
13 way we got to do this, this and the other thing. Planning
14 everything.

15 Q But he didn't have anything finished at
16 that point?

17 A No, no.

18 Q There was nothing he could show you?

19 A No.

20 Q When you talk in terms of making draft
21 proposals, what do you mean by that? What was he doing when
22 he was drafting these proposals?

23 A Well, the way he wanted to make some
24 advertising about the--about President Carter, you know.
25 Only Carter, because we were working only with Carter.

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1
2 Only with Carter in our committee.

3 Q Amigos?

4 A Amigos, yes.

5 Q Did he write something out and hand it to
6 you to think about or--

7 A No, they showed everybody over there, you know,
8 the way he wanted to do the advertising.

9 Q With pictures?

10 A Well, some drafts and papers, you know.

11 Q Did he say that this would be radio
12 advertising, newspaper advertising?

13 A Oh, yeah, he was talking about the price,
14 this station cost too much money, this is less money, and
15 this and the other thing.

16 This advertising cost more or less.

17 Q Was anything said about where the money was
18 coming from? Where you were going to get the money to
19 do this?

20 A No, he don't say nothing about that. Because
21 over here everybody works, you know, on credit plans. You
22 know, all the time all the advertising works on credit plans.

23 Q The stations?

24 A I don't know the way he handled his business.

25 Q What you are saying is the advertising--

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A Through television and radio.

Q Yes, but who extends the credit all the time?

A Joe Franco.

Q How about other agencies, to your knowledge?

A I think the same way. Because in Kennedy
it was the same way.

Q How do you know that?

A I heard.

Q Who did you hear it from?

A From the newspaper, reading the newspaper.

Q Oh, all right.

A The way they did it.

Q How did you happen to get involved with the
Joe Franco advertising agency rather than some other agency?

A Well, first of all, Joe Franco is a friend
of mine for many years, and he is one of the best in town
in advertising, political advertising. I think he's the
best.

Especially, he is a friend of the New Progressive
Party.

Q Did you call--or how did you first contact
Mr. Franco?

A Well, he come to us because he told us that
Mr. Carter needs a lot of advertising, and the way he can

1
2 handle this thing is--he told us to raise some money,
3 because we needed so much advertising to win the election--
4 I mean the primary.

5 Q How did he get in touch with you? By
6 telephone?

7 A Yes, by telephone. Yes. By telephone.

8 Q Was this before the committee was formed?

9 A No, no, after the committee was formed.

10 Q So, is it your testimony that Franco solicited
11 you, rather than you soliciting Franco?

12 A Well,--

13 Q Do you understand what I mean by soliciting?
14 Going to--

15 A Well, we wanted to do some advertising, and
16 the best place to do it is through Joe Franco. And then we
17 called him and he called us; yes, he can handle it.

18 I told him the only way we can do it is through
19 you, because we know you. And then we got--you know, we
20 can handle the business with him better than with anybody
21 else.

22 Q Did Viera Martinez get involved in that
23 decision?

24 A No. Not in the Amigos de Jimmy Carter; maybe
25 in the Democratic Party, but not in the Amigos de Jimmy Carter.

1
2 No, not in the Amigos de Jimmy Carter.

3 You know, the same people--almost the same people
4 work with one party as work with the other party, because
5 we are all the same. But we don't get involved in--you
6 know, I mean, the part of our business, we get so much
7 money involved in Joe Franco's account, like at the
8 Democratic Party they got with Joe Franco.

9 But we keep separate accounts.

10 Q How do you know that?

11 A Because I handled that business; the Amigos
12 de Jimmy Carter. And we had nothing to do with Carter-
13 Mondale. Carter-Mondale is worked by other people. I don't
14 know who is the treasurer, I don't know who is the secretary.

15 Q How about Viera Martinez? He was--

16 A Viera Martinez is the chairman of the
17 Democratic Party over here, but I don't think that he is
18 in charge of the treasurer or president or something like
19 that. I don't know.

20 MR. WHITEHEAD: Let's go off the record.

21 (Short recess.)

22 BY MR. WHITEHEAD: (resuming)

23 Q All right.

24 Are you familiar with the fact, Mr. Jurado, that
25 Mr. Dovelie was connected with the Carter Mondale Presidential

1
2 Committee?

3 A Yeah, I heard about that.

4 Q Are you familiar with the fact that Mr.
5 O'Connell, Terry O'Connell, was connected with the Carter
6 Mondale Presidential Committee? Did they tell you that they
7 were?

8 A Well, they don't tell me nothing about that,
9 but I know they belong to the Carter-Mondale Committee.

10 Q At this meeting at Joe Franco's office, did
11 they introduce themselves as being part of the Carter-Mondale
12 Presidential Committee?

13 A No.

14 Q No?

15 A No.

16 Q Did Joe Franco introduce them as being part
17 of the Carter-Mondale Committee?

18 A Yes, he spoke something about it.

19 Q At that meeting?

20 A Yes.

21 Q Did he say "they are connected with the
22 Carter-Mondale Committee?"

23 A No, they don't say nothing.

24 Q Joe Franco, did he say it?

25 A No.

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1
2
3 Q You just said he said it at the meeting,
4 that he said something.

5 A Yes. They were talking about they are a
6 member of the committee of the Carter-Mondale.

7 Q Who said that?

8 A I think it was Joe Franco when he introduced
9 to the people, you know--

10 Q When he introduced you?

11 A No, no, he talked with me, he introduced
12 everybody that was there, you know, this is Mr.--

13 Q Okay. He didn't say, "Mr. Jurado, this is
14 Mr. Dovelie?"

15 A No, no.

16 Q He had everybody--

17 A So many people over there.

18 Q But did he say that they were connected with
19 the Carter-Mondale Committee?

20 A I think he told us that they are members of
21 the Carter-Mondale Committee.

22 Q Okay. Did you not testify that Mr. Franco
23 called you about this meeting; to come over to this
24 meeting?

25 A Yes, I think he called us--

Q Who is "us?"

1
2 A Perez and myself, he called. And he told us
3 that he got a meeting that night to discuss the advertising.

4 Q What advertising?

5 A About Jimmy Carter.

6 Q Did he say over the phone who would be at
7 that meeting?

8 A No, he don't say nothing. He told us he's
9 going to have a meeting that night.

10 Q About the Jimmy Carter advertising?

11 A Right.

12 Q Did he say Jimmy Carter advertising, Comite
13 Amigos?

14 A Amigos, yes.

15 Q He said that to you?

16 A Yes, that he wanted to discuss with us about
17 what we got to do, this and the other thing, and his idea
18 about the advertising.

19 Q What was his idea about the advertising?

20 A Joe Franco's?

21 Q What idea--

22 A Oh, about the television and the radio and
23 the cans and all this.

24 Q About the cans? He had the idea about the
25 cans?

1
2 A About the cans.

3 Q And the radio marathon?

4 A Yes.

5 Q That was Franco?

6 A Franco; Joe Franco.

7 Q Were you surprised when you walked in and
8 found all these people there: Dovelie, O'Connell, Keefe?

9 A Well, I know, because all the time--we went
10 once about this particular case; only once.

11 Q You went where once?

12 A That night we get together over there.

13 Q Did you have another--did you have a meeting
14 prior to this meeting?

15 A No, no, no, no. That's the only time we
16 have the meeting. That's the only one. In that meeting in
17 Joe Franco's office. No other place.

18 And it don't surprise me because I know they got
19 a lot of staff over there. They got about six or seven
20 people that take care of the film and the advertising: Pena
21 and all the other fellows over there.

22 Q But were you surprised to see Dovelie there,
23 or Keefe or O'Connell?

24 A Well, yes, I--

25 Q Well, what was your reaction? What did you

1
2 think?

3 A Well, I don't know. There was no reaction
4 to me, because I saw a lot of people over there and I say,
5 well, maybe they are involved in the business.

6 But I don't know nothing about that, because I
7 don't know them.

8 Q And was Martinez there?

9 A No.

10 Q No?

11 A No.

12 Q On this statement of organization, where did
13 you obtain the form? Who gave you the form to fill out?

14 A From the office of Viera Martinez.

15 Q Mr. Martinez, Mr. Viera Martinez gave you
16 this?

17 A From the office.

18 Q Did he give it to you?

19 A No, his secretary.

20 Q Did she say that Mr. Viera Martinez told me
21 to give you this?

22 A Supposed to, because it's from his office.

23 Q But that's not my question.

24 A No, I know your question. But I don't know
25 if he told his secretary that's from him. He told me that's

1
2 the organization of the committee.

3 Q Viera Martinez told you this?

4 A Yes.

5 Q He said, "this is the organization of the
6 Comite Amigos?"

7 A Yes.

8 Q It was typed up there, right?

9 A Right.

10 Q And handed to you from a secretary to Viera
11 Martinez?

12 A Well, she give me the forms and we typed in
13 the office of Perez.

14 Q How did you know to fill out this form?

15 How did you know that you had to fill out a form
16 for the FEC?

17 A Well, because Viera Martinez, he sent me
18 a book about the organization of the committee.

19 Q Was it an FEC book?

20 A Right.

21 Q All right.

22 It was sent to you by Viera Martinez?

23 A Right. That's the only way I can get it.
24 There's no other way I can get it.

25 Q Okay. When you found out that you had to file

1
2 a statement of organization, you didn't have that in the
3 phone book? I mean, it wasn't in that book?

4 A No.

5 Q How did you know where to get this form?

6 A Well, I got it through the office of Viera
7 Martinez.

8 Q Yes, but how did you know to call him?

9 A Oh, well, because he is the Democratic Party
10 over here. That's the only way you can get something like
11 that.

12 I can't send to Washington. I don't have enough time
13 to order some papers to Washington. Because everybody knows
14 he is the president, or the chairman of the Democratic Party
15 over here.

16 Q And also at that time he was the Speaker of
17 the House of Representatives, right?

18 A Right. Yes, sir.

19 Q In connection with television or radio
20 advertising, do you know what a media buy is, two words:
21 media and buy?

22 Do you know what that is?

23 A That's the--at this moment I don't know what
24 that is. I can't remember.

25 I think it's something between the people that are

1
2 involved in the advertising and the agency; right?

3 Q Well, it would be right if you had stated
4 the radio advertising and the agency, or the television
5 station--

6 A Right.

7 Q --and the agency.

8 A Right.

9 Q All right?

10 A Yes.

11 Q Now, Joe Franco, for example, would make the
12 media buys for the radio and the television advertising.

13 A Right.

14 Q Okay?

15 A Yes.

16 Q Did you ever discuss with Franco how much
17 money would be available to make these media buys, these
18 radio advertising purchases, these television advertising
19 purchases?

20 A Never.

21 Q Well, how did you arrive at a decision to
22 place this t.v. advertisement or this radio advertisement
23 or this newspaper advertisement?

24 A Well, that's Joe Franco's idea. They told
25 us the way--the correct way to do this, this and that, in that

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1
2 form, through the newspaper, the television; that way,
3 this way, because we don't know nothing about the
4 advertising.

5 Q Did Joe Franco and you, Mr. Rodriguez, ever
6 sit down and say, this is how much money we're going to
7 have for this kind of advertising?

8 A No. Because at that time we made the
9 arrangements with him, and we don't have that money. We
10 had to raise the money.

11 Q How did you go about raising the money?
12 We talked about radio marathons and the cans.

13 A That's right.

14 Q Do you remember how much money was raised?

15 A Oh, I think it was about--we paid him the
16 first--I can't remember exactly how much, but we paid him
17 around eighty thousand dollars. Eighty thousand dollars.

18 That's the money we raised from the cans and
19 the collections.

20 Q Who handled the money when it was deposited in
21 the bank after the collection? Who counted it and put it in
22 the bank?

23 A Well, volunteer people and Perez. I was in
24 there and--

25 Q You were there?

1
2 A Yes, sure.

3 And then Perez used to go to the bank at night
4 and make a deposit of the money at the bank.

5 Q Did you maintain all of those records; the
6 deposits, the bank accounts and all of that? Do you still
7 have those records?

8 A I don't think so, because that office we
9 got over there, Olmedo's, they closed the office and...

10 Q All right.

11 You listed the Banco de Santander de Puerto Rico.

12 A Right.

13 Q Is that the only bank account you used?

14 A The only bank account.

15 Q All right.

16 Did you have a written contract with Joe Franco
17 & Associates?

18 A (Shaking head in the negative.)

19 Only verbal.

20 Q What were the terms of this verbal agreement?
21 What did you agree upon?

22 A Nothing. Because we don't have nothing to
23 offer to him.

24 Q Well, what did he say to you that he would
25 do?

1
2 A When we get the money, we deposit the money
3 in the bank and we send a check to him. The money we got,
4 only seventy thousand, eighty thousand dollars. We paid to
5 him all the money we raised.

6 Q Yes, but what did he promise to do for the
7 Comite Amigos?

8 A Well, all the advertising for radio and
9 television, and some papers, some letters and some things
10 like that.

11 Q You stated at that meeting that was held in
12 Mr. Franco's office that you were going to keep separate
13 accounts, Comite Amigo's separate account.

14 How was that arrived at? Who said we will keep
15 separate accounts? What was said?

16 A Well, Perez and me, we got together and we
17 said we have to open an account and keep separate accounts,
18 because we are different things, one from the other one.

19 We don't want--

20 Q Well, who is "one from the other?" Who is
21 the "one" and who is the "other?"

22 A Well, Amigos de Jimmy Carter and the
23 Democratic Party.

24 Q Is the Democratic Party the Carter-Mondale
25 Committee?

1
2 A The Carter-Mondale Committee.

3 Q All right.

4 It's not the Democratic Party of Puerto Rico?

5 A Right. It's the Carter-Mondale.

6 Q It's the Carter-Mondale Committee?

7 A And Amigos de Jimmy Carter.

8 Q Right. So we're talking about two things;
9 the Comite Amigos de Jimmy Carter and the Carter-Mondale
10 Presidential Committee?

11 A Right.

12 Q Viera Martinez was connected with the Carter-
13 Mondale Presidential Committee?

14 A Right.

15 Q Dovelie was connected with the Carter-Mondale
16 Presidential Committee. O'Connell, Keefe, right? To your
17 knowledge?

18 A Yes.

19 Q Jurado was connected with Comite Amigos.
20 Perez was connected with Comite Amigos?

21 A Yes.

22 Q All right.

23 Who--you said that Perez and you, that is
24 Rodriguez Perez--

25 A Perez Rodriguez.

1
2
3 Q Perez Rodriguez, okay.

4 You said you had to keep separate accounts from
5 the Carter-Mondale Presidential Committee.

6 Did anybody else say to you that you had to keep
7 separate accounts?

8 A No.

9 Q No. How did you know that you had to keep
10 these separate?

11 A Because we get one committee, that was Amigos
12 de Jimmy Carter, and I was the treasurer and he was the
13 president, and we had the responsibility for that committee,
14 separate from the other one.

15 We don't have nothing to do with the other one.

16 I don't know what they do with their money over
17 there. I don't know. That's not my business. My business
18 was to keep that money and to get--every time we get some
19 money to give to Joe Franco and pay the advertising for
20 Jimmy Carter.

21 Q Did anyone ever say to you that it would be
22 illegal for you to put the two accounts together; Carter-
23 Mondale and--

24 A No, no, no. But I know that.

25 Q Where do you know that from?

1
2 A Well, because I know it's the way to--the
3 same way you handle two businesses, two separate corporations.
4 You cannot handle them with one account; you have to have
5 separate accounts.

6 It's the same business.

7 Q All right.

8 At the meeting that you held at Joe Franco's office
9 with Dovelie, O'Connell, Keefe, present, was only English
10 spoken or was Spanish and English spoken?

11 A Both.

12 Q Both. What was said in Spanish and what
13 was said in English?

14 A Oh, I can't remember because that would be
15 a different opinion.

16 Q Did either Dovelie--

17 A Because that was "arroz con pollo."
18 That was everything was "arroz con pollo."

19 Q Did Dovelie speak Spanish?

20 A I don't know if he speaks Spanish.

21 Q Well, during that meeting did he speak
22 Spanish?

23 A No, I can't remember. But he don't know how
24 to speak Spanish. I think so.

25 Q O'Connell, did he speak Spanish, any Spanish?

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A I can't tell you.

Q Okay.

A I don't think they speak Spanish.

Q Was there any other meetings that you held, either at Joe Franco's office or someplace else, where Dovelis, Keefe, O'Connell, or any one of those people were present?

A No. No.

Q That was the only one time?

A That was the only one.

Q How long did it last?

A An hour and a half. Something like that. I left before them. Perez and me, we left before.

Q How long did you stay?

A About an hour, an hour and a half.

Q And while you were there did you see any video--any television tapes, anything like that, shown on television?

A No, no. No, we did some tape after that.

Q After that?

A After that.

Q Where did you do that?

A It was in the street. I think it was in the group of girls with the jingle, something like that, in front

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1 of the--in the street. It was in the street.

2
3 Like when you call the people to give some money,
4 you know, something like that. That's the only television
5 advertising we did.

6 Q So, the advertising with money being passed
7 in cans and stuff--

8 A Um-hum.

9 Q --is that the only advertisement that Comite
10 Amigos did?

11 A No, we make that big--like we did in the
12 tent over there in the big place. We got dancing, we got
13 all this.

14 Q But did you put this on television? Did
15 you make a film of it?

16 A No, no, no.

17 Q How many films that were made had the Comite
18 Amigos involved?

19 A Only one.

20 Q And was that the one that was shot with the
21 girls--

22 A Right.

23 Q --passing cans?

24 A Right.

25 Q Who else was in that; do you remember?

1
2 A No. It was a group of girls; Joe Franco, I
3 don't know what he did. And they over there--

4 Q Well, do you remember seeing it on television?

5 A Oh, yes, sure.

6 Q Was the governor in it?

7 A No. No.

8 Q No, I mean were there pictures of the
9 governor shaking hands with Jimmy Carter?

10 A No, no, no, no, that was another--I saw it
11 on television, but that wasn't--didn't belong to the Amigos
12 de Jimmy Carter; it was the Carter-Mondale Committee.

13 They did some advertising. I saw it on television.

14 Q We've seen two advertisements. Okay?

15 A Yes.

16 Q In one advertisement the governor is shaking
17 hands in Washington with Jimmy Carter, alright?

18 In another advertisement he is making a speech
19 at a rally here in Puerto Rico.

20 A I can't remember that.

21 Q You don't remember that?

22 A No. The only advertisement I remember was
23 the advertisement we made in the street. But we paid for
24 that.

25 Q Do you remember any--other than that ad, that

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1
2 had a statement at the end, "Paid for by Comit  Amigos de
3 Jimmy Carter."

4 A I can't remember. I know we make only one
5 ad on television, because it was very expensive.

6 Every time they have on television it costs about
7 five or six hundred dollars. Only thirty seconds.

8 Q Right.

9 Did you ever go to Joe Franco's office to
10 view the television advertising before it was put on
11 television?

12 A No. No, because the day he made that
13 advertisement, he told me, well, we'll be on television
14 Wednesday--for example, Wednesday night at seven-thirty,
15 eight o'clock. I watched my television in my home and I
16 saw the advertisement.

17 That's the only way. I never went down there to
18 see it. I don't have time to do that, you know.

19 Q We saw at least two ads in Joe Franco's
20 office which involved the Comit  Amigos.

21 A In television?

22 Q Television ads.

23 So, could you be mistaken in that there was only
24 one?

25 A Well, he made that advertisement over there

1
2 in the streets. I think it was half a day. Half a day.

3 Q But that's the only one that you remember?

4 A The only one, yes. The people give some
5 money every time they passed; put it in the can.

6 I can't remember the other one.

7 Q Well, when--

8 A I think he made two. I remember now, he made
9 two. But the first one was no good, and then he told us
10 that he have to choose the second one because it was much
11 better than the first one.

12 Maybe he changed, you know, the same day.

13 Q Did you ever see--did you receive all the
14 Comite Amigos bills from Joe Franco?

15 A Yes.

16 Q Do you have those?

17 A No. I sent that to Washington. I think I
18 sent that to Washington. Yes.

19 Q All right.

20 When you got these bills from Joe Franco, did you
21 write out the check immediately for the bills--strike the
22 question.

23 Did you have enough money to pay these statements
24 of Mr. Franco when they came?

25 A Sometimes.

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1
2 Q When?

3 A The first week we made the radio marathon
4 and then the cans. The first couple of weeks we give him
5 all the money we got.

6 Q And after that when the bills came you didn't
7 have anything to pay them with?

8 A Right. Everybody went home.

9 Q Did you get involved in any fund raising to
10 pay off Mr. Franco after the primary campaign?

11 A No. No, that was Joe Franco's idea.

12 Q Yes, but did you help him with the idea?

13 A Oh, well, yes. Sure.

14 Q What did you do?

15 A Nothing. Just helped him sell tickets, or
16 something like that, for the banquet we organized and then
17 we sell some tickets and we helped him, you know, because we
18 owed the money to him.

19 Q Did Viera Martinez get in touch with you
20 about this fund raising to pay off the bills?

21 A Well, not directly, but I got help. Joe
22 Franco got some help from me and the personnel from the--
23 from Viera's office, to raise the money.

24 Q Who was the person from Viera's office?

25 A Who is the...?

1
2 Q You said that he got some help from you and
3 a person from Viera's office?

4 A No, no, the girls working for them over
5 there. You know, the girls from the employees.

6 Q Oh, I see.

7 A From the office of Viera Martinez; to sell
8 the tickets to help Joe Franco.

9 Q Did you have any contact with Viera Martinez
10 himself in connection with this fund raising?

11 A Oh, yes, we help, everybody. Sure.

12 Q Did you talk to Viera Martinez personally
13 about raising money for Mr. Franco?

14 A No, no, Vieras he told me, we have to raise
15 some money, and you've got to help him. Okay. I told
16 him okay.

17 Q Well, why did he say that we have to raise
18 some money?

19 A Well, because Joe Franco is looking all the
20 time for somebody to pay the bill.

21 Q Whose bills?

22 A The Amigos de Jimmy Carter.

23 And he is calling everybody. He is going crazy
24 because it's too much money. He don't know what people he
25 has to get in touch with to get some money.

1
2 He called me, listen, Franco, you know, I don't
3 have the money. We don't got any money in the bank. We
4 give all the money we got from the collection in the street.

5 I gave to him all the money we have.

6 He said, well, what do you think if we give
7 some banquet or something to raise the money? I said, well,
8 okay, it's up to you.

9 He rented the hotel. He made all the arrangements
10 for the hotel, and then he gave a banquet.

11 I told him, well, give me some tickets; I can sell
12 for you some tickets. And he called Viera Martinez, some
13 people from the office to help him, from Joe Franco's office,
14 too. All the people they send out to sell tickets, because
15 he needed the money.

16 The man was in very bad shape.

17 Q Mr. Viera Martinez was the guest speaker at
18 the banquet; wasn't he?

19 A Yes.

20 Q Did you work with Mr. Viera Martinez in
21 connection with him being the guest speaker, at all?

22 A No, no, it's Joe Franco's idea; to get
23 somebody to speak over there, you know, like the president
24 of the House of Representatives.

25 Q Well, did you, at any point when these bills

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1
2 were mounting up for Comite Amigos and they were getting
3 bigger and bigger, did you say to Joe Franco, you know,
4 we don't have the money to pay for this?

5 A I told him.

6 Q What did he say?

7 A He kept quiet. He think--I don't know,
8 somebody rain some bills, you know, dollar bills maybe.
9 I told him you're going crazy with this thing.

10 Okay, we started, we have to finish. That's what
11 he told me. Because I know we can't get that money.

12 Q He said that to you?

13 A I told him.

14 Q You told him what?

15 A That we don't have a place to raise the
16 money, because we raised all the money we can.

17 Q But then you said that he said something to
18 you. What did he say to you?

19 A Well, we have to do something. We'll give
20 another banquet or something like that to raise the money.

21 Q No, no. I'm talking about the huge--the
22 large amounts of money that Franco was rolling up on these
23 television advertisements and the radio advertisements and
24 on the newspaper advertisements, did you ever say, hey, Joe,
25 you're spending too much money. We don't have it.

1
2 A I told him a couple of times.

3 Q When?

4 A When he did it, at the same time he did it.

5 I told him we can't--we are involved in a lot
6 of money.

7 Q And what did he say to you?

8 A We have to do it.

9 Q He said we have to do it.

10 What did he mean?

11 A I don't know what relation he got, but that
12 he wants to do something like Jimmy Carter won the primary
13 in Puerto Rico. I don't know what kind of connection he
14 had with that. I don't know.

15 Q Did he ever say to you is it all right if I
16 spend more money on advertising?

17 A He told me, well, it's all right, go ahead.

18 Q No, no. Did he ever say to you, is it all
19 right for me to spend this money?

20 A No, no, he never said that, no. But he don't
21 stop the advertising.

22 Q He just sent you the bill?

23 A Yes, he send all the bills all the time.

24 Q And you said--

25 A I don't got the money.

1
2 Q You don't have any money.

3 Your testimony is that Franco made all of these
4 expenditures of money without your authority as the
5 treasurer of the committee?

6 A Right. That's the truth.

7 Q Did you know whether or not somebody else
8 told Franco--did anybody tell you that someone else told
9 Franco to make these expenditures?

10 A Well, it had to be somebody, because--I can't
11 tell you, because I don't know, but somebody has to be in
12 the middle of the situation, because it's impossible for
13 Joe Franco to accept from Perez and me so much amount of
14 money, especially after the primary when nobody can give
15 nothing.

16 Q But I'm talking about during the primary,
17 when you were shooting for that vote and you were spending
18 a hundred and sixty some thousand dollars worth of Comite
19 Amigos money.

20 A Two hundred and twenty thousand dollars.

21 Q Two hundred and twenty-seven thousand dollars.

22 A Right.

23 Q Of Comite Amigos funds.

24 When you were spending that kind of money,
25 somebody--you say somebody must have been telling Franco to

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1
2 do it.

3 A Sure. Because I can't stop him.

4 MR. WHITEHEAD. Okay. Let's take a break.
5

6 (Short recess.)
7

8 MR. WHITEHEAD: Back on the record.

9 BY MR. WHITEHEAD: (resuming)
10

11 Q Mr. Jurado, I am showing you what is a copy
12 of a report of Comite Amigos de Jimmy Carter. It is
13 identified as FEC Exhibit 2 and it consists of four pages--
14 five pages. I'm sorry.

15 The first page is the report of receipts of
16 disbursements for political committee, other than an
17 authorized committee.

18 Then there are two pages of Schedule A, itemized
19 receipts. One page of Schedule B, itemized disbursements,
20 and one page of Schedule B, debts and obligations.

21 The front page--there is a signature on here
22 which purports to be your signature. I would ask you to
23 look at that.

24 (Above mentioned document marked
25 as FEC Exhibit No. 2.)

1
2 THE DEPONENT: Yes, sir.

3
4 BY MR. WHITEHEAD: (resuming)

5 Q Are you familiar with that?

6 A Yes, I did it.

7 Q Is that your signature that's on there?

8 A Um-hum.

9 Q Did you fill out these forms?

10 A Yes.

11 Q Where did you get the forms themselves?

12 A From Washington.

13 Q Did you write for the forms?

14 A No. As soon as we send the paper to
15 Washington, yes, they sent me this information and I filled
16 it out.

17 Q So, it's your testimony that when you filed
18 the statement of organization you then got back the forms
19 that had to be filled out?

20 A Yes.

21 Q And was this the only form that you ever filled
22 out?

23 A I think so. Yes.

24 I don't know if I got another one over there
25 someplace. I can't remember.

Q I think this is the only one on file.

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1 A Yes.

2 Q Did you have any help or assistance in
3 filling this out?

4 A No. After the election I don't have any
5 help.

6 I was alone.

7 Q Did you take the information from Comité
8 Amigos records for this--these reports?

9 A Yes. Yes.

10 Q Mr. Jurado, I show you what has been
11 identified as FEC Exhibit 3.

12 (The above-mentioned document was
13 marked as FEC Exhibit No. 3.)
14

15 BY MR. WHITEHEAD: (resuming)

16 Q This purports to be a copy of a bill from
17 Joe Franco & Associates, Inc. to Comité Amigos de Jimmy
18 Carter, Hato Rey, Puerto Rico, dated May 30th, 1980:
19 attention Viera--A. Viera Martinez.

20 And I ask you, are you familiar with this document?

21 A Yes, I'm familiar with this. You know why?
22 Because Joe Franco made the promotion on the radio for the
23 banquet. He did. And then he charged. Because Amigos de
24 Jimmy Carter at that time don't have nothing.

25 Q Well, if you know, why did he send it not to

you but to Martinez?

5 A Because that's the only way, maybe, he can
6 get his money. Through Viera Martinez. Because he can't
7 get it through us.

8 Like I told you before, that's "arroz con pollo."
9 He's looking for money.

10 Q Okay. Let's go back to the meeting at Joe
11 Franco's office with Dovelie, O'Connell, Keefe, the
12 production people, Joe Franco.

13 Were the duration of contracts discussed--the
14 contracts between Franco and Comite Amigos, discussed at
15 that meeting at all?

16 How long they were--how long they would last, the
17 duration of them?

18 A From Joe Franco to us?

19 Q Yes.

20 A Yes, about fifteen or twenty minutes. No
21 more than that.

22 Q What was discussed?

23 A Well, the way he wanted to do it. This is
24 much better than the other. You know.

25 Q How about the billing, the billing to the
Comite Amigos, was that discussed?

A Well, we talked with him and he told us we

1
2 keep separate accounts for Carter-Mondale and Amigos de
3 Jimmy Carter, he bill to us and he bill to the other
4 people. Different promotions, advertising.

5 Q Who said we will keep separate accounts?

6 A I told Perez--Perez Rodriguez and me, we
7 told Franco.

8 Q And what did Franco say?

9 A That's all right. No problem.

10 That's the way we had to do it.

11 Q Did you say keep a separate account for them,
12 for Carter-Mondale?

13 A No, no. He opened an account for us.

14 Q Right.

15 A And he opened an account for Carter-Mondale.

16 Q How do you know that?

17 A I know, because--I know because I saw the
18 television advertisement. I had to get the bill. And the
19 radio, too. And the newspapers.

20 You know, when you order some advertisement, you
21 know what advertising you ordered.

22 And we never get the bill for Carter-Mondale.

23 Q Did you have any other meetings with Joe
24 Franco during the course of the Presidential primary campaign,
25 aside from this one meeting?

1
2 A Oh, yes, we'd get together once in a while
3 in the activities we have.

4 Q Well, how often was this, after this one
5 meeting?

6 A Once a week, twice a week.

7 Q What did you discuss? What were you talking
8 about?

9 A Well, he asked me how is the business, how
10 is it going on, how much money we can expect to get from
11 that activity.

12 I told him, well, I don't know, we'll have to wait
13 until we finish.

14 Q Was this before the radio marathon and the
15 can collection or what?

16 A It was in the days before the election.
17 The Saturday, 15th, I think.

18 Q That was one meeting.

19 A Well, we get together in the same place we
20 got the activity, you know.

21 Q What activity?

22 A Well, like I told you before, we had the tent
23 with the music and we sell food and all this stuff.

24 Q Yes, but I thought that was--correct me, but
25 I thought that that was not the day before the primary, but

1
2 a week or so--

3 A No. We have lot of days we have that
4 activity.

5 Q You mean you had--the can collection was
6 going on.

7 A Oh, yes.

8 Q All right.

9 A All the time. Yes.

10 Q But the radio advertising, was that going on
11 every day?

12 A Every day.

13 Q Did Franco or anyone else ever ask you for
14 your approval for billing a radio advertisement or a t.v.
15 advertisement?

16 A No.

17 Q Neither one?

18 A Neither one.

19 Q In your letter of October 20th, 1981, to
20 us, to the committee, you state that the Comité Amigos had
21 a small office and a small warehouse for campaign materials.

22 Can you tell us where that small office is
23 located?

24 A In the Muebleria Olmedo, on Ponce de Leon.

25 Q Is that a building?

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A Yes, that's a building.

Q Is that the same building that Viera Martinez was in, the Carter-Mondale--

A No. Carter-Mondale was in Munoz Rivera.

Q Okay. How long did you have this office?

A Oh, we got that office for--I think about a month or something like that. A month or a month and a half. I can't remember exactly.

Q Do you remember what the cost was?

A No, no, it was free.

Q Oh, free. Who gave it to you?

A Olmedo. The owner of the Muebleria.

Q Okay. Where was the warehouse?

A Well, in the same building. They got the room in the back like this size and we keep all the propaganda over there. The advertising.

Q Do you have any bumper stickers or posters or advertisements left?

A No, all are gone.

Q Where did they go? Did they get lost, destroyed, what?

A No, no, no, because we give to all the people all around the island.

Q Oh, they're all gone?

1
2 A Yes, they're all gone.

3 Q You used them up?

4 A Yes.

5 Q Have you ever heard the name Butch James?

6 A No.

7 Q Or Buddy James?

8 A No. No, I don't know those names. I know
9 only one James Butch. He gets married with this girl,
10 Marisol Malaret.

11 MR. WHITEHEAD: All right.

12 I have no further questions.

13 Off the record.

14
15 (Off the record.)

16 MR. WHITEHEAD: The witness has waived the
17 signature. Let me state for the record that we
18 operate under a statute that calls for
19 confidentiality. Okay? That means you don't
20 publish what happens here or discuss it with other
21 people. Okay?

22 That includes the reporter. Eventually every-
23 thing does get out in the public record, but not
24 now. It's still confidential.

25 Thank you.

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REPORTER'S CERTIFICATION

I, OLIVIA D. GITTENS, court reporter, do hereby
certify:

That I, acting as shorthand reporter, reported
the aforementioned proceedings by machine shorthand to the
best of my knowledge and ability, and that I thereafter
caused the same to be reduced to typewriting under my
direction as hereinbefore set forth:

That the foregoing pages are a full, true and
correct record of the proceedings in the aforementioned
matter:

That I am not of counsel or attorney for either
or any of the parties to said matter, nor interested in
any way in the outcome of the cause named in said caption.


Olivia D. Gittens

1 BEFORE THE FEDERAL ELECTION COMMISSION

2
3
4 In The Matter Of:

5 Comite Amigos De Jimmy Carter : MUR 1354
6
7
8
9
10

11 Deposition of:

12 ANGEL VIERA MARTINEZ
13

14 The deposition of Angel Viera Martinez was
15 held before Arthur G. Pineda, Registered Professional
16 Reporter, on the 27th day of October, 1982, at the
17 Office of the United States Attorney, Federal Office
18 Building, Hato Rey, Puerto Rico.
19
20
21
22
23
24
25

(Interpreter, court reporter
and deponent duly sworn.)

Whereupon:

A N G E L V I E R A M A R T I N E Z,
having been first duly sworn, was examined orally and
testified upon his oath as follows:

DIRECT EXAMINATION

BY MR. WHITEHEAD:

Q Would you give me your name and address,
both business and personal?

A Yes. My name is Angel Viera Martinez, 6
Hofres Street, Laguna Terrace Condominium, Apartment 1-E,
Condado, San Juan.

I am the minority floor leader in the House of
Representatives in the Capitol Building.

Q Mr. Viera Martinez, we have the interpreter
here.

A All right.

Q We took two depositions yesterday, and I have
left it up to the witness as to whether he feels more
comfortable taking the deposition in Spanish and having the
interpreter do it, or doing it in English.

It's up to you; whichever you prefer.

1
2 A Well, whenever you say more comfortable,
3 we always prefer the vernacular.

4 But I can--if you wish me to, answer in English.

5 Q That's fine.

6 If you have any particular difficulties, you can
7 address the question to Raymond.

8 A All right.

9 Q Okay. How long have you been in the position
10 of minority floor leader?

11 A Well, since January 1980, because as a
12 result of the last election in Puerto Rico,--

13 Q What year was that?

14 A 1980. November, 1980. Nobody had the control
15 of the House, because we--when we say "we," it is the
16 New Progressive Party voters challenged two district seats
17 which were certified by the Electoral Commission of the
18 Popular Party, which is the opposition party.

19 And these two seats were in controversy and the
20 controversy reached the U.S. Supreme Court, and we arranged
21 a way to work the regular session, which according to our
22 constitution starts the second Monday of January, and we
23 designated two committees; one from the New Progressive
24 Party representative and one from the Popular Party
25 representative, and we co-chaired all the committees.

1
2 But it didn't work. And I have some experience
3 in the House, the Legislature, and I get in contact with
4 one of the most experienced legislators of the other party
5 whose name is Severo Colberg, and now he is the speaker.

6 And he gave me his vote to be the speaker. And
7 we gave him twenty-five to be the vice-speaker. And it was
8 just to arrange a better way of working the whole session,
9 and the arrangement--the agreement was that I will be
10 speaker until December 31st, 1981, then he will continue
11 as vice-speaker in January, 1982.

12 And after that, the two cases in court were
13 decided and they obtained the majority, and of course they
14 have the control of the House, then he was designated the
15 speaker.

16 Q So, he is the speaker and you became the
17 minority floor leader?

18 A The minority floor leader.

19 Q But prior to the '80 elections you were
20 speaker of the House of Representatives?

21 A Yes, I was speaker from 1977 to 1980,
22 December 31st.

23 I was speaker from 1969 to 1972. In 1972 we
24 lost the election and I came to the House as minority
25 floor leader.

1
2 In 1976 we won the election and I came, again,
3 as Speaker of the House.

4 And the rest of the story...

5 Q Well, how far back do you go in a political
6 career? When did you start in politics?

7 A I am very young in politics.

8 In 1968.

9 Q Did you seek elective office back in 1968;
10 is that it?

11 A Yes. I was in the free practice of law,
12 but I am for statehood. I have always been for statehood,
13 and after the plebiscite in 1967, as we obtained forty-nine
14 per cent of the votes, the people urged Mr. Ferre, who
15 headed that group, to form a party, and we formed the New
16 Progressive Party in 1967, and of course we went to the
17 election in 1968, and we won the governorship and the
18 House by one vote.

19 And, of course, I came to the House as a
20 representative by District Number 2, which included the
21 Condado area, all the north part of the--of Ashford and
22 all that area, up to Llorens Torres; way back from the
23 airport, that area, and they selected me as the Speaker
24 of the House.

25 And the Senate was controlled by the other party,

1
2 the Popular Party, and Mr. Rafael Hernandez Colon was
3 the President of the Senate. Later, in 1972, he was
4 elected governor.

5 In 1976 he was defeated and Carlos Romero Barcelo
6 was elected governor.

7 And in 1980--

8 Q Again in 1980 he was elected governor.

9 A --Carlos Romero Barcelo was elected again,
10 and he is the president of our party, the New Progressive
11 Party, and I am the vice-president of the New Progressive
12 Party.

13 Q Prior to 1968 you were engaged in the
14 private practice of law?

15 A That's right.

16 I was San Juan District Attorney up to July,
17 1955. Yes, I resigned and opened an office with the former
18 Associate Justice of the Supreme Court for the free practice
19 of law.

20 And then I entered politics. I don't know if I
21 made the right decision, but I am satisfied.

22 Q So, you are a full-time representative? I
23 mean, you don't have any other duties, private practice or
24 anything like that?

25 A No. Although it is not prohibited.

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Q I understand that.

A When I was San Juan District Attorney I handled many cases and a few cases, murder cases, were defended by a very wonderful gentleman who used to be the Speaker of the House, and he was in the free practice of law.

And in one of these cases I asked him not to go before a jury, being the Speaker. Not because he was not an honest man, but because the position goes with the person, and of course, by that time I didn't imagine that I was going to be in politics, and I didn't imagine, either, that I was going to be the Speaker.

So, when I came to the House as Speaker, I had my own medicine.

Q You followed your own advice, is that it?

A Yes. A personal conviction that when we have a position like Speaker of the House, we should not go into private practice.

Q Just as a general matter, what are the duties of the minority floor leader?

A Well, the minority leader heads the delegation, the minority delegation. He chairs the caucus. He is a member of all the committees, as an ex-officio member which can vote.

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1
2 And he organizes the work of the different
3 committees. He represents the position of the party in
4 the House.

5 And many other duties.

6 Q What was your official position with the
7 Carter-Mondale Presidential Committee?

8 A Campaign coordinator.

9 Q When did you first become the campaign
10 coordinator for the Carter-Mondale Presidential Committee?

11 A Well, it was around two months, more or less,
12 before the March 16th, 1980 presidential primary.

13 Q This would be around January 16th of 1980,
14 January 15th, thereabouts?

15 A It could be. It could be, yes.

16 Q All right.

17 How did you come to be the campaign coordinator
18 for the Carter-Mondale Presidential Committee?

19 A By that time Mr. Franklin Delano Lopez
20 claimed that he was appointed President Carter's campaign
21 coordinator.

22 Q Who is Franklin Delano Lopez?

23 A He was--he chaired the New Democratic Party
24 in Puerto Rico. And--

25 Q That's a separate party from your party?

1
2 A Yes, a separate party, because the New
3 Progressive Party is a party in local politics. The New
4 Democratic Party is affiliated to the National Democratic
5 party.

6 We have compulsory primary law, and we register
7 the party according to that law. And, of course, it was--

8 Q You register the voter according to the
9 party, is that what you are saying?

10 A No, no, the party was--the New Democratic
11 Party was registered--

12 Q Okay.

13 A --according to that law, and we were--we are
14 affiliated to the National Democratic Party.

15 I am the chairman, now, of the Democratic Party
16 in Puerto Rico. I chair the party here.

17 And the National Democratic Party admitted us
18 as an affiliated party to the National Democratic Party.

19 So, Mr. Franklin came into problems, which I don't
20 think we have to mention, and so the Carter-Mondale
21 Committee, to which we explained our position, designated
22 him as campaign coordinator with the ethnic group.

23 Q This is Franklin Delano Luis?

24 A Yes. In the nation.

25 Q All right.

1
2 A And I was, by that time, the executive vice-
3 president of the New Democratic Party in Puerto Rico, and
4 after that, the state convention selected me as the chairman
5 of the New Democratic Party. And I was designated, as I
6 told you before, two months before the presidential primary,
7 as Mr. Carter's campaign coordinator.

8 Q Who made that designation?

9 A It was the Carter-Mondale Committee people.

10 Q Who?

11 A I think--well, we received a telegram, which
12 I haven't found. I think it was signed by Mr. Strauss,
13 Robert Strauss, who was the--

14 Q Robert Strauss, the chairman of the
15 Democratic Party?

16 A Yes, I think so. I'm not quite sure.

17 Because I haven't found the--it was a telegram
18 or something.

19 Q Yes.

20 A Or it could be from the President, himself.
21 I really don't remember.

22 Q Did you initiate the contact to be the
23 campaign coordinator for the Carter-Mondale Presidential
24 Committee, or did they contact you?

25 A No. We visited the Carter-Mondale headquarters

1
2 with relation to the problems arisen from around Mr.
3 Franklin Delano Lopez, and we told Robert Strauss, who
4 was the campaign coordinator, the national campaign
5 coordinator of the President Carter, Walter Mondale
6 campaign, that we could not accept Franklin Delano Lopez
7 as President Carter's campaign coordinator.

8 And we then--after that, we talked with Tim
9 Kraft.

10 Q Tim Kraft?

11 A Yes. Because in the conversation we had
12 with Tim Kraft, Robert Strauss--

13 Q You say "we," who was the "we" and where was
14 the conversation held?

15 A It was in the Carter-Mondale headquarters
16 in K-Street--

17 Q In Washington, D.C.?

18 A In Washington, D.C.

19 Well, the resident commissioner was in that
20 meeting, the resident commissioner, Baltasar Corrada, I
21 believe.

22 Q Would you say that name, again, please?

23 A Baltasar Corrada Berrio, our resident
24 commissioner--

25 Q In Washington?

1
2 A We call him, well, he's the resident
3 commissioner in Congress. In Washington, yes.

4 The vice--the national committee-woman, who is
5 Mrs. Nilvea McClintock, Virgilio Ramos, if I--yes, I think
6 he was there.

7 Q Who is he? Who is Virgilio Ramos?

8 A He is an aide and chief of staff of the
9 governor. And he is a member of the executive committee
10 of the New Democratic Party.

11 And in that same meeting was present Mrs.
12 Madeline Gillet. She was by that time the secretary of
13 the New Democratic Party. Now she is the vice-chair and
14 the secretary at the same time.

15 Maybe there was somebody else. I don't remember--
16 recall the names now.

17 And then, after that, we came to Puerto Rico and
18 then we had filed a challenge--not a challenge, charges
19 against Mr. Franklin. And so we started--

20 Q What were these charges against Mr. Delano
21 Lopez?

22 A Well, this has been said in a substantial
23 and general way, because he was running the party from a
24 personal point of view.

25 There was not an executive committee elected,

1
2 duly elected, but there were finger appointed members of
3 the executive committee.

4 I want everything to be done the right way.

5 Q Where did you file the charges?

6 Was it a court case that you filed--

7 A No, no, before the state convention, because
8 we have a state convention and the state convention is the
9 largest body, political body of the New Democratic Party.

10 Q When was this held, this convention?

11 A Well, we have a state convention. It's
12 a permanent body.

13 Q Oh, okay. It's a permanent body?

14 A Yes.

15 Q It sits all the time?

16 A Yes.

17 And I think the charges--I'm not quite sure,
18 but we started offering the--hearing testimony and offering
19 evidence before the state convention, which the state
20 convention is a two hundred members convention, in December
21 1969.

22 I am not quite sure.

23 Q '69?

24 A I think.

25 Q Not '79? '69?

1
2 A No, '79. '79.

3 And we were about to submit the case--I am using
4 the words we use in the law practice--when somebody from
5 the Carter--on behalf of Carter-Mondale came and it was
6 Terry O'Connell.

7 Q What does Terry O'Connell look like?

8 A Well, he is a tall man, young, somewhat
9 fat. A very fine gentleman. He has an artificial arm.
10 He is a veteran of Korea. He has a patch. I don't know
11 if it's the left or the right eye. He has a patch, an
12 eye patch.

13 He's easy to identify.

14 Q Okay.

15 A And he came on behalf of the Carter-Mondale
16 Committee, because by that time we had already the meeting
17 with the people of the headquarters of the Carter-Mondale
18 Committee, and he was the person who talked to Franklin
19 and talked to us and then Franklin resigned and he was
20 appointed to that position as part of the crew--or as
21 coordinator of--maybe part of the people that were working
22 with the ethnic group in the nation.

23 And we had a news conference in my office, as I
24 was Speaker, and I think it was by mid-January when I was
25 then designated campaign coordinator for President Carter.

1
2 Q What were your duties as the campaign
3 coordinator for the Carter-Mondale Presidential Committee?

4 A Mainly field work, because that's my
5 specialty; like house to house work, organization of people,
6 leaders, the organization--get out the vote and all of this.
7 Especially field work.

8 Q Was this in addition to your duties as
9 Speaker of the House at that time?

10 A Oh, of course. That's a different camp,
11 but--

12 Q This accounts for the twelve and thirteen
13 hour days?

14 A Yes. I was the Speaker of the House, but
15 this is political work. And besides that, I work in the
16 political phase of the local political party, the New
17 Progressive Party, because we were, in that same year, in
18 the election year.

19 Q Right.

20 A So, I had too much on my hands.

21 Q Mr. O'Connell was here--was Mr. O'Connell
22 here in Puerto Rico when he had this discussion with you
23 and Franklin Delano Lopez, after which Delano Lopez
24 resigned?

25 A Well, he came, as I told you before, when we

1
2 were--when we had the meeting of the state convention he
3 came that same day, I think during the night, or I don't
4 know if it was early in the evening, and we stopped the
5 hearing to get in conversations to try to arrange--to reach
6 an arrangement, an agreement; and we did.

7 And, of course, his intervention was the crucial--
8 was crucial to reach that agreement, because he got in
9 contact with Franklin Delano Lopez and with me and the
10 other leaders of the New Democratic Party, and we reached
11 that agreement, which I told you about.

12 Q Did Mr. O'Connell--to your knowledge, did
13 Mr. O'Connell remain in Puerto Rico from that point through
14 to the primary?

15 A No, I think he went back to Washington.

16 Then he came and he went back. So, he made trips
17 often, but he--maybe he could have stayed here two, three
18 days.

19 Q Well, to your knowledge. Whatever you know
20 is what I'm asking.

21 A Yes.

22 Q What materials were you provided with from
23 the Carter-Mondale Presidential Committee in Washington to
24 work with down here in Puerto Rico?

25 What did they give you?

1
2 A Almost nothing. Just some posters of
3 President Carter and, I think, stickers, just a few stickers.

4 Q Were they in English or in Spanish?

5 A No, re-elect the President. The poster,
6 re-elect the President was the poster of President Carter.

7 But a few--because the campaign in the United
8 States is different from our campaign. Here, we have
9 posters everywhere, stickers everywhere.

10 Q But were they in English or were they in
11 Spanish?

12 A No, no--

13 Q They were in English?

14 A In English. Re-elect the President said
15 the poster.

16 Q Was Terry O'Connell the only individual with
17 the Carter-Mondale Presidential Committee that took
18 strategy, or initial strategy with you as the Carter-Mondale
19 Presidential Committee coordinator?

20 A Well, he was the only person, as I remember,
21 who intervened in this controversy when I got the
22 appointment as campaign coordinator.

23 Q Now,--

24 A In Puerto Rico, after our visit to the Carter-
25 Mondale headquarters.

1
2 Q Now, we're talking now in the neighborhood
3 of December of 1979 and January, 1980, is that correct?

4 A That's correct, right.

5 Q And after that you became the campaign
6 coordinator for Puerto Rico for the Carter-Mondale
7 Presidential Committee; is that correct?

8 A Yes.

9 Q From that point, what did you do?

10 You say that you were supplied with posters. You
11 say that O'Connell went back and forth.

12 How did you start organizing, now that you had
13 the whole thing together?

14 A Well, when I said posters, just a few
15 posters. Just a few posters, we didn't receive material.

16 And you know, the presidential primary was going
17 to be held on March 16th. It was just less than two months
18 before.

19 I immediately called the congressional district
20 coordinators, because according to the electoral division
21 for the Democratic Party in Puerto Rico, we have eight
22 congressional districts, which coincide with the eight
23 senatorial districts in local politics: San Juan, Bayamon,
24 Ponce, and so forth.

25 And for each congressional district we have two

1
2 coordinators.

3 And besides that, in each congressional district
4 we have twenty-five delegates to the state convention.

5 So, I got in contact by telegram, immediately,
6 with the campaign coordinators, and I had a meeting with them
7 just to organize the campaign and it had to be a very fast
8 campaign; it was a short period of time.

9 And we had, also, a meeting of the executive
10 committee. And then we organized meetings of the twenty-
11 five delegates of each congressional district, and with all
12 those democrats in each of--in each one of the congressional
13 districts, just to explain the whole campaign and to
14 organize the campaign for the presidential primary.

15 You've got to know that here the New Progressive
16 Party, a substantial part of the New Progressive Party are
17 democrats. Part of the New Progressive Party members and
18 leaders are Republicans, because we have a Republican party,
19 a local Republican party, affiliated to the National
20 Republican Party.

21 And the Popular Party, which is the opposition
22 party, and our eternal adversary, they participate in the
23 democratic primaries or caucus if there is a candidate to
24 the White House which they can--if that candidate can
25 support their position, their ideological position as

Commonwealth.

And I tell this in this way, because they are always for Senator Kennedy, and they went to the presidential primary supporting Senator Kennedy, who is a wonderful senator, a wonderful leader in the United States, along with his brother, the past John F. Kennedy, and Puerto Rico pays tribute, always; and Robert Kennedy.

And when we have an event like this, the forces went to each side and then, although we are fighting to elect President Carter and they are fighting to elect Senator Kennedy, it's a fight in local politics, the New Progressive Party against the Popular Party and vice versa.

But that's the difference, one of the differences in national politics. Because our status problem is one of the--I think the fundamental issue.

Q Were you given by Mr. O'Connell or anyone else, at this point, I'm talking at the very beginning, any advertising budget? How much money you were going to be able to spend to campaign for President Carter's re-election--or for his election in the primary?

A They told me that the Carter-Mondale had assigned twenty-five thousand dollars to Puerto Rico.

They told me that they had assigned a larger sum of money to other states and that the budget was lower--

1
2 Q You're talking about Puerto Rico?

3 A Umm?

4 Q You're talking about Puerto Rico?

5 A Yes, of Puerto Rico.

6 They told us that the budget of Puerto Rico for
7 the presidential primary was twenty-five thousand dollars.

8 But they sent me just ten thousand dollars in
9 pre-printed drafts. I say pre-printed, because the drafts
10 were fifty dollars, one hundred dollars, and I think maybe
11 a few might be five hundred dollars. I don't remember.

12 But they were pre-printed.

13 Q Whose signature was on them?

14 A No. It was forms of pre-printed. I was
15 authorized to sign.--

16 Q All right.

17 A --by Carter-Mondale.

18 Q Where were the funds behind that? Were they
19 in a bank down here or up there?

20 A No, no, in the bank where the Carter-Mondale
21 had the--

22 Q Where they had their account?

23 A Their account.

24 And let me tell you something. This ten thousand
25 was for expenses and I kept thirty-seven hundred dollars to

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1
2 pay the telephone bill, as the telephone bill came too late.
3 I had those thirty-seven thousand dollars in drafts.

4 Q Thirty-seven hundred or--

5 A Thirty-seven. Three thousand, seven hundred.
6 dollars.

7 Q All right.

8 A So, I sent the telephone company the
9 remainder of the drafts I had from the ten thousand, which
10 is three thousand, seven hundred dollars to pay part of the
11 bill, because the bill is over five thousand.

12 Q When was this?

13 A Well, it was by--it could be mid-'80. I
14 don't know.

15 Q This was not early though? This was not--

16 A After.

17 Q After the--we're talking about after the
18 primary at this point?

19 A Yes, after the primaries, yes. Because the
20 telephone company sent the bill, so I was keeping part of
21 the drafts to pay the phone bill--

22 Q Right.

23 A --because most of the phone calls were made
24 during fund raising for the Carter-Mondale Committee in the
25 headquarters of the Carter-Mondale in Puerto Rico, right in

1
2 Hato Rey.

3 Q What street?

4 A Munoz Rivera Avenue, and I think the number
5 was 50.

6 Q Is that a building?

7 A It's a building. The first floor.

8 Q Do you have any ownership in that building?

9 A Oh, no. No, no.

10 Q Do you have any offices in that building?

11 A Oh, no, no. It was rented by me. It was
12 remodeled and rented by me.

13 Q It was remodeled and rented by you, or
14 remodeled by you and then rented by you?

15 A No, no, it was rented and I had to remodel it.

16 Q All right.

17 A The expenses for the remodeling and to make
18 it a good place to work, because I had to do that.

19 But not as a Carter-Mondale coordinator. It was
20 a personal business for political campaign, my personal
21 political campaign. But then I re-rented--on the lease--
22 let me think of the word.

23 Q Sub-let? .

24 A Sub-leased for two months to Carter-Mondale,
25 And I think the amount was one thousand dollars

1
2 for each month. So they sent me two thousand dollars.

3 Q Were there any other tenants of that building?

4 A Well, there are others. There were others,
5 because we are in the street floor.

6 Q How big a building is it?

7 A It is--I think three or four stories.

8 I rented the street floor and the mezzanine and
9 an office in the back part, and of course, the garage part
10 they have we used as a garage.

11 Then when I sent the telephone company this
12 draft, signed by me, I was authorized to sign, and they
13 sent the bills, the drafts I mean, or the checks, let me
14 say the checks, they returned it to me with a letter telling
15 me that the account, Carter-Mondale's account in the states
16 was closed.

17 Q This is in mid-1980?

18 A It could be. Well, it was after the
19 presidential primary.

20 Then my name had been on those checks. So, I
21 discussed this with the executive committee of the New
22 Democratic Party and the New Democratic Party paid the three
23 thousand, seven hundred dollars to the telephone company,
24 because I told them that I didn't want to have my signature
25 on a check which had not been honored.

1
2 So, it is a debt the Carter-Mondale has with the
3 New Democratic Party.

4 Q Did anybody with the New Democratic Party
5 check with the Democratic National Committee at that point?
6 On that thirty-seven hundred dollar telephone bill?

7 A If anybody else from here...?

8 Q Yes. If anybody from Puerto Rico called the
9 National Democratic Committee and said, you know, would you
10 take this thirty-seven hundred dollar bill, or shall we pay
11 it, or what?

12 A No. After the telephone company wrote me a
13 letter saying that the--according to the information from
14 the bank that the account was cleared, I sat down at the
15 headquarters with--I think his name was Fishman, and I took
16 him--I took him the bills from the telephone company, and
17 from the Puerto Rico Communications Authority, because there
18 is a bill pending, over five thousand dollars, with the
19 Puerto Rico Communications Authority in relation to
20 telegrams, because I made an account for Carter-Mondale at
21 the Puerto Rico Communications Authority.

22 Now, of course, this Authority has stopped
23 operations with relation to telegrams. But there is a bill
24 of over five thousand dollars. And--

25 Q Who stopped operations? I don't understand
that.

1
2 A The Puerto Rico Communications Authority--

3 Q Right.

4 A --was in charge of--they have two
5 communication projects, one is the telephone and the other
6 is the telegram. But they ceased operations on telegrams
7 because it was too costly and--well, by that time we used
8 the telegram as part of the way we communicated with the
9 leaders, and the bill is over five thousand dollars, the
10 Carter-Mondale owes this Authority, the Puerto Rico
11 Communications Authority over five thousand dollars in
12 telegrams.

13 Q Would this be Charles Fishman?

14 A I think so.

15 Q And he was connected with what committee?

16 A With the National Committee.

17 Q The Democratic National?

18 A Yes.

19 Q Okay. Did you know an individual by the
20 name of Dovellet, Evan Dovellet?

21 A Yes, I know him. Ambassador Evan Dovellet.

22 Q That's right.

23 How did you become acquainted with Evan Dovellet?

24 A He came here to Puerto Rico, I couldn't say
25 when, by maybe two or three weeks before the presidential

1
2 primary. I cannot figure out exactly when did he come,
3 but it was in relation to the presidential primary. It
4 could be two weeks before, it could be ten days before, it
5 could be three weeks before, but I can't remember, exactly.

6 Q Did he have a--was he introduced to you as
7 having a title within the Carter-Mondale Presidential
8 Committee?

9 A Yes; the chairman of the finance committee.

10 Q Chairman of the finance committee?

11 A Correct.

12 Q Are you familiar with an individual by the
13 name of Robert Keefe?

14 A No, not familiar. I know him.

15 Q Where do you know him from?

16 A Well, because Bob Keefe has his offices in
17 the same building where the DNC has their headquarters.
18 That is 1625 Massachusetts Avenue in the Alfa Building. I
19 think he is on the fifth floor of the headquarters, and
20 the National Democratic Party is on the fourth floor.

21 I met him in his office, or in the building,
22 somewhere in the building, maybe in the elevator. We were
23 introduced by Terry O'Connell.

24 Q Did you know Mr. Robert Keefe from Puerto
25 Rico?

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A No.

Q Was he ever in Puerto Rico at any time?

A I don't know if he had been in Puerto Rico at any time.

Q To your knowledge, was he at all involved in the presidential primary activities in Puerto Rico, in the Carter-Mondale Presidential Committee?

A As far as my recollection, he, Mr. Keefe was not involved.

Q Was he physically present at any meetings you held or rallies, or--

A To my recollection he hasn't been present.

Q How about a Buddy James?

A Yes, I met him in my office, the Speaker's office, I was Speaker. And I think he came in with Mr. Terry O'Connell. He is an attorney.

I don't know if he had a position or not in the Carter-Mondale Committee, but he came in my office when I met him, but he was accompanying Terry O'Connell.

Q When was this?

A Well, it was before the primary, the presidential primary. Maybe the 8th of January or February, it could be. I can't tell you, because I don't remember.

Q Somewhere in the January-February time frame,

1
2 time period, is that what you're saying?

3 A Yes, but I cannot remember if it was in
4 January or if it was February.

5 Q Was Dovelie with them at that time?

6 A No. Evan Dovelie came alone because he was
7 the chairman of the finance committee, and he was the
8 person who used the services of the media, of the Joe
9 Franco & Associates, in the name of the Carter-Mondale,
10 and he ordered services for the Carter-Mondale.

11 I didn't do it because I was just the campaign
12 coordinator.

13 Q How did Joe Franco & Associates come to be
14 selected to do the media advertising?

15 A Well, Joe Franco & Associates is an
16 advertising agency for many years well-known here,
17 especially--I think it is one of the best, and I think it
18 is the best in political, the political campaigning.

19 And he came in--his agency was particularly
20 involved in campaign advertising. When the present
21 governor, Carlos Romero Barcelo, ran to be mayor of San
22 Juan, he handled his campaign.

23 Of course, since that time when I met him, he
24 had been handling campaigns of different candidates,
25 including my personal campaign, and he is a friend of mine,

1
2 because he is a member of the New Progressive Party and
3 a member of the New Democratic Party. He is a Democrat.

4 Even people from other parties use his services
5 because he is, I think, a very, very, wonderful person
6 and his agency has an expertise and well-known experience
7 in political campaigning.

8 Q Well, who was it that suggested to Dovel
9 who had the purse strings, to use Joe Franco & Associates?

10 How did we come about to get France & Associates?

11 A I don't know, really, if it was from the
12 governor's office or if I, in some way, suggested it.

13 Q Okay.

14 A It could be one or the other way, or it
15 could be the both together.

16 Q Did there come a time when you had a meeting
17 in your office with Joe Franco, Dovel, O'Connell and Buddy
18 James in connection with the advertising to be done in the
19 Puerto Rican primary?

20 A Not in my office. You said in my office?

21 Q Yes. Mr. Franco has testified that there
22 was a meeting in your office on--what he thinks was the
23 18th of February in 1980.

24 And he says--he testified that Mr. Dovel was there,
25 Mr. O'Connell, not certain of Mr. James, but he talked about

1
2 a lawyer who was in attendance at that meeting; Senator
3 Efrain Santiago.

4 A Um-hum.

5 Q Virgilio Ramos, Mr. Franco and yourself.

6 A Yes.

7 Q Are you familiar with this meeting?

8 A Yes. I have just some--I am appealing to my
9 memory.

10 I don't exactly--if it was in Joe Franco's or in
11 my office.

12 Q He testified that it was in your office.

13 A It could be. It could have been in my office.

14 I am not denying that it was not in my office. I
15 am trying to--

16 Q Take your time.

17 A Okay. It could have been in my office, and
18 it could have been in relation to the media, to the
19 advertising campaign, the advertising.

20 Q Well, he had recollection of a specific
21 meeting being held in connection with media advertising,
22 at which Franco was present.

23 A Yes, I think so.

24 Q Was Dovelie present?

25 A That's what I don't remember, if he was or he

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was not present. He could have been present, because--

Q Was O'Connell present?

This meeting was supposed to have lasted from about four in the afternoon until nine or thereabouts at night. Nine or ten o'clock at night. A long meeting in your office at the Capitol.

A It could have been.

What I'm telling you is that I don't remember exactly if these persons you have mentioned, were all of them there.

And I told you that I know that we had a meeting, but I am not actually sure if it was in my office. I am not denying that we had the meeting; what I am telling you is that I don't remember all the persons present.

Q But it is possible, and you cannot say for certain that it was not held--it is possible that it was held in your office?

A No, it is. Yes, absolutely.

Q And you cannot testify for certain that it was not held in your office and not held somewhere else?

A That's right. It is possible that it could have been in my office.

Q All right.

But you do recall a meeting that was held with Mr.

1 Franco in which the campaign advertising was discussed,
2 do you not?

3 A Yes.

4 Q All right.

5 A Yes.

6 Q Did Mr. Franco--he has testified that at that
7 meeting he proposed--he was asked what it would cost to run
8 a successful campaign in Puerto Rico, in this primary, and
9 he proposed to the participants that about a quarter of
10 million dollars would have to be spent.

11 Do you have any recollection of that particular
12 conversation?

13 A Well, I cannot--I don't have recollection as
14 to how much it would have cost by that time, but I am sure
15 that that's one of the most important things to talk about,
16 because of the campaign.

17 But I am not sure about the amount that he was
18 telling him for the cost of the campaign. But, for sure,
19 when we talk with an advertising agency and the campaign, you
20 talk about cost.

21 Q It was over twenty-five thousand? Do you
22 recall it being over twenty-five thousand, the--which was
23 the figure--

24 A Yes.

1 Q --that Mr. Dovelie had originally set for
2 you, is that not correct?

3 A No, no, no, not Dovelie.

4 The Carter-Mondale Committee announced me through
5 Terry O'Connell--

6 Q Okay.

7 A That Puerto Rico was assigned just twenty-five
8 thousand dollars. But I never received twenty-five thousand
9 dollars. Just I received ten thousand dollars in drafts,--
10

11 Q Right.

12 A --as I told you before.

13 Q Right. Okay.

14 A And Mr. O'Connell brought me the draft on
15 two different occasions.

16 Q For ten thousand dollars?

17 A For ten thousand dollars. That's the only
18 thing.

19 Q At that meeting, was the figure twenty-five
20 thousand dollars discussed as a figure for appropriation
21 for media advertising?

22 A Well, I don't remember the terms, but of
23 course, twenty-five thousand dollars, you cannot make a
24 campaign like that.

25 And let me tell you something, I--during the

1
2 internal primary to select the delegates to the congressional
3 district to form the state convention, Mr. Joe Franco
4 handled all the advertising and it cost almost two hundred
5 thousand dollars.

6 It was the internal primary held on October 22nd,
7 1978, and it was the internal primary, just to select the
8 delegates to the state convention, which is the maximum--
9 the supreme party of the Democratic Party in Puerto Rico.

10 Q To your recollection was--

11 A What I want to add is a presidential primary
12 may cost that or more.

13 Q Were these figures discussed at this meeting,
14 to your recollection?

15 A Yes, I think--

16 Q Tell me what was said, what transpired,
17 what happened? Who said what?

18 A Well, I cannot tell you what each one said,
19 because it is hard for me to remember everything.

20 What I can say is that Evan was the person who
21 asked for services from Joe Franco & Associates, and maybe
22 somebody from the governor's office as liaison.

23 Q Virgilio Ramos?

24 A Could be. And Pedro Rivera Casiano it could
25 be also.

1
2 Because they--in some way they--Pedro Rivera
3 Casiano runs a publicity agency, too. He is a public
4 relations man, a wonderful person.

5 And, of course, the governor is a democrat and
6 the governor took a vigorous part, especially in the field,
7 in all the meetings in the island, the rallies, because, as
8 I told you before, the Populares--the Popular Party was on
9 the other side.

10 Q Right.

11 A And, of course, we were in an election year,
12 and the presidential primary, everybody wanted to win it,
13 because that will be reflected in the November election.

14 Q For the governor's race?

15 A Yes, for the governor's race, and for them,
16 too.

17 Q Right.

18 A So the fight was a very strong one, and the
19 Kennedy people had money and Senator Kennedy came here, and
20 Mrs. Jackie Onasis came here, invited by the Popular
21 Democratic Party. They had fund raisers, according to the
22 papers.

23 And I think they had--I think, I heard about, that
24 they have an independent committee, too, and they made a
25 very strong campaign.

1
2 Senator Kennedy came in person and he went to the
3 big rally, as I remember, the last rally. And we had to
4 fight that campaign.

5 Q Getting back to the meeting, though. That's
6 what I want to concentrate on.

7 Mr. Franco testified that the discussion came
8 about that a successful campaign would require in the
9 neighborhood of two hundred and fifty thousand dollars, and
10 the discussion centered on how to raise the money and how
11 to appropriate that money.

12 Do you have recollections of that particular
13 discussion? Now, mind you, the meeting went from--he
14 testified from four to about ten. We're talking about a
15 six hour span.

16 A Well, I don't have recollection.

17 It could have been that Joe Franco said that they
18 told about two hundred fifty thousand, and that's
19 reasonable, because I told you as an example that the--

20 Q I understand that. But what I'm talking
21 about now--

22 A Yes.

23 Q --is what further conversation was held
24 in connection with raising that two hundred and fifty
25 thousand dollars, spending that two hundred and fifty thousand

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dollars; media advertising and the like?

A Yes. And I told you that it is reasonable that this amount could have been discussed in the meeting. It could have been two hundred and fifty or more.

What I told you is that I don't remember the exact amount--

Q Okay. Fine.

A --they talked about, what we talked about.

Q What did--do you have any recollection of what the Carter-Mondale people, and I'm talking now about Dovellet, O'Connell, James, or any one of those combinations, talked about how much they could appropriate for the Puerto Rican campaign?

We're having an early meeting--this is an early meeting as to revving up the advertising.

A Yes. I don't think that they--or we talked about how much Carter-Mondale could use in the media.

But I'm sure that Evan Dovellet had the authority to get services from Joe Franco or from the media for the campaign here, because he was the chairman of the finance committee. That's why he was here.

Q Right.

A Because I was not entitled, not authorized to make contracts in connection to media, everything, in the

1
2 name--on behalf of Carter-Mondale.

3 Q Do you recall Mr. Dovelie making any mention
4 of how to raise the two hundred and fifty thousand dollars?
5 How to spend the two hundred and fifty thousand dollars?

6 A No, I don't.

7 Q Well, what other subjects were you talking
8 about? You know, a meeting of this duration, what else did
9 you discuss?

10 A No, what we talked about--because it was
11 called to my attention by Terry O'Connell, and I think that
12 in a previous visit that Terry O'Connell made to me,
13 together with Buddy James, that any independent committee
14 could be organized, but it cannot have any relation with
15 the Carter-Mondale campaign.

16 I was not acquainted with the federal election
17 law. And they told me that in--that an independent committee
18 could be organized by Democrats and they have to comply
19 with certain different provisions of the laws, and they
20 emphasized that the Carter-Mondale--an independent committee
21 could not be in any way related with the Carter-Mondale
22 campaign, because any--if they were related then the
23 expenses of the independent committee will be charged to
24 the presidential candidates.

25 Q And this was explained by Mr. James and Mr.

1
2 O'Connell?

3 A Yes, but I'm--it could have been there, but
4 I think that previously they told me about that.

5 Q Franco testified that at that meeting a
6 lawyer and Mr. O'Connell went to great lengths to explain
7 the difference between independent committees.

8 A I think so, in that meeting they talked about
9 that.

10 But I also am telling you--

11 Q What does Buddy James look like?

12 A Well, he's a tall, black gentleman. He's
13 an attorney.

14 Q Black?

15 A Yes. And when I say--not black--just to
16 describe, because we don't have--

17 Q No problem. I know what you mean.

18 How old would you say he is?

19 A It could be between forty and fifty, more
20 or less. But let me leave it clear for the record, because
21 we don't have racial problems here, and I said black, and
22 it's just to describe you the person.

23 But we treat everybody here, black and white, the
24 same way. We don't discriminate.

25 And I want to leave this clear for the record.

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Q I understand.

A Just to describe to you the person. He's a wonderful person. A very--everybody sympathized with him.

Q During that meeting, it was decided that an independent committee had to be set up?

A No, no, they told--we talked about the law and that an independent committee could be organized; not a decision to organize an independent committee, as I remember, because as I was already advised that I could not allow any independent committee to get involved in the Carter-Mondale campaign affairs.

Q Who advised you?

A Terry O'Connell, Buddy James, who is an attorney, and he knows about the law. He told me that. And later, Evan Dovelie told me about the provisions of the law.

Q At that meeting, was there a discussion about a committee known as the Comite de Amigos de Jimmy Carter?

A No, not at that meeting, as I can remember.

Q Were the names of Adalberto Jurado discussed, or Virgilio Rodriguez--

A Adalberto.

1 Q --Manuel Rodriguez.

2 Were those names discussed at that meeting?

3 A No, not to my recollection.

4 I knew about the Comite de Amigos, Friends of
5 Jimmy Carter --

6 Q Right.

7 A --organization. And I--to the best of my
8 recollection, I think Mr. Rodriguez showed me a letter
9 that he and other people were organizing, or had organized
10 a group to campaign for President Carter.

11 Q When was this?

12 A I think it is February. I'm not--and I,
13 of this fact I am sure, I showed him a letter telling him
14 that any independent committee could not--was nonauthorized
15 committee--

16 Q Let me get an exhibit on that.

17 Call it FEC Exhibit 1 for Identification.

18 Mr. Viera Martinez, I show you what has been
19 marked for identification as FEC Exhibit 1, and it purports
20 to be a copy of a letter with your signature on it, dated
21 February 19th, 1980, to Mr. Manuel Perez Rodriguez. It's
22 in Spanish.

23 A Yes.

24 Q And I ask you, are you familiar with the
25

1
2 original of that letter?

3 Is that your signature, first of all?

4 A Yes, it is my signature.

5 Q All right.

6 A Yes. And with a carbon copy to Mr. Adalberto
7 Jurado..

8 Q Yes, I see that.

9 A Yes.

10 Q Now, what is that, by the way?

11 A This is the letter I was referring to, which
12 I wrote to attorney Manuel Perez Rodriguez, who chaired
13 the Komite Amigos de Jimmy Carter, telling him that the
14 Komite Amigos de Jimmy Carter was not authorized by
15 the Carter-Mondale.

16 Q Could you do me a favor; would you translate
17 that for the record?

18 MS. CALLAHAN: Would you like an interpreter
19 to read it?

20 THE DEPONENT: No, I don't think so.

21 MR. WHITEHEAD: It's his letter.

22 THE DEPONENT: "February 19th, 1980. Manuel
23 Perez Rodriguez, Esquire. P.O. Box 1512, San Juan,
24 Puerto Rico, 00936.

25 Dear Mr. Perez Rodriguez, I have been informed

1 that you preside the group denominated Amigos
2 de Jimmy Carter to campaign in Puerto Rico for
3 the re-election of President Carter.
4

5 The organization of this committee, Amigos
6 de Jimmy Carter, is not authorized by Carter-
7 Mondale Presidential Committee, Inc. and its
8 activities cannot be related in any way with
9 the campaign of the President Carter Committee
10 in Puerto Rico.

11 The campaign for President Carter in Puerto
12 Rico is governed by the federal election law, and
13 it is necessary that a stringent compliance with
14 all the provisions of the federal election law
15 in relation to the campaign of President Carter.

16 Cordially, Angel Vieras Martinez. Carbon
17 copy to Mr. Adalberto Jurado."

18 BY MR. WHITEHEAD: (resuming)

19 Q What is your title?

20 A I beg your pardon?

21 Q Your title.

22 A No, I didn't write the title here, but I
23 wrote this as the campaign coordinator of President Carter.

24 Q Before going into this, you state that you
25 had--you were given ten thousand dollars in drafts, or

1
2 checks.

3 A Yes.

4 Q And you had the authorized signature.

5 Did your signature have to go on file at the
6 bank in Washington for the Carter-Mondale Presidential
7 Committee?

8 Did you sign a bank card?

9 A No, I don't think so. I don't think so.

10 Q Well, who was the account?

11 A Carter-Mondale.

12 Q Was it called Carter-Mondale Presidential
13 Committee? Was it drawn on a Washington bank?

14 A Well, I think so.

15 Q Well, was it in a Puerto Rican bank?

16 A No, no, in a Washington bank.

17 Q All right.

18 A In a Washington bank.

19 Q And you, alone, had an authorized signature
20 on these checks?

21 A Me, alone.

22 Q You, alone.

23 A These ten thousand drafts.

24 Q Right.

25 But you did not--did you sign an authorization card,

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1
2 a signature card with the bank in Washington?

3 A I don't think so. I--

4 Q Well, how did they honor the checks?

5 That's my problem.

6 A Well, that's my question, too.

7 I was authorized to sign by the Carter-Mondale
8 Committee. Terry O'Connell brought me the drafts, and the
9 checks which I signed out of those three thousand, seven
10 hundred were honored.

11 Q Outside of--the sixty-three hundred dollars--

12 A Yes.

13 Q --was honored?

14 A Honored.

15 Q All right.

16 A And they didn't honor this thirty-seven
17 hundred dollars which I mentioned in my testimony, because
18 the--when the check reached the bank to be honored, this
19 long way, maybe, the checks were returned to the telephone
20 company and they sent photocopies to me saying that the
21 account was closed.

22 Q Right.

23 A But not because--

24 Q But that doesn't go to the fact of honoring
25 the signature. Nobody--no bank will authorize the payment

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2 of funds out of an account unless the signature at the
3 bottom of that check is authorized and they have it on file.

4 Did you give Mr. Dovelie your signature on a card
5 to take back to Washington, D.C.?

6 A I don't really remember. I think I did. I
7 could have done that.

8 But I am telling you the fact that the amount I
9 signed in these drafts, out of the thirty-seven hundred
10 dollars, all of these drafts were honored.

11 It could have been that I signed, maybe, a card.
12 And I know ~~that~~ you have to file your signature in the bank.

13 Q Right. I understand you do.

14 A It could have been done that way.

15 But what I am trying to tell you is that I don't
16 remember, exactly.

17 Q All right.

18 Well, who maintained the running balance on the
19 account? Did you keep a checkbook balance on these drafts?

20 A No, they were separate. Not in a book, they
21 were separate drafts that they have in a package that they
22 brought me; two different packages at two different times.

23 One was the five thousand, I think; the other
24 was the other five thousand. And they delivered it to me,
25 and they were separated.

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Q And they were in different amounts?

A Different amounts. Fifty dollars--

Q And that was already pressed into the draft, itself? The amount was in there?

A Yes, it was pre-printed with the amount.

Q So, in effect, it was being taken care of in Washington?

A Yes.

Q The handling of the--

A Of the account.

Q --account--

A That's right.

Q --was being taken--excuse me.

MR. WHITEHEAD: Off the record.

(Off the record.)

BY MR. WHITEHEAD: (resuming)

Q These were not money orders or anything like that?

A No, no.

Q No.

A No, drafts.

Q They were already denominated by amount of money, but the only signature that was authorized was yours?

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1 A Right.

2 Q And it said at the top: Carter-Mondale
3 Presidential Committee, Inc.?

4 A Yes.

5 Q That's what it said?

6 A Yes.

7 Q Is that your testimony?

8 A As I remember, yes.

9 Q Right.

10 A As I remember.

11 And the amount printed in the same check.

12 Q Exactly.

13 A The same draft.

14 Q Okay. One further question. You stated that
15 when you were appointed or when you became the campaign
16 coordinator for the Carter-Mondale Presidential Committee
17 in Puerto Rico, there was a press conference held; is that
18 correct?

19 A After the press conference where I--where
20 Franklin accepted the--

21 Q Ethnic.

22 A --ethnic group position, at that time we
23 held a press conference in my office.

24 Q Did you ever receive anything in writing which
25

1
2 authorized your appointment as campaign director, or
3 campaign coordinator?

4 A I think I received a cable, a telegram,
5 something like that. But I haven't found it.

6 Q Is this the same one from Mr. Strauss,
7 Robert Strauss? Is that the one you are talking about?

8 A It could have been from Mr. Strauss or it
9 could have been--

10 Q Do you recall the writing?

11 A I think so.

12 Q Okay.

13 A Because when we went to the Carter-Mondale
14 Committee to discuss with Robert Strauss, Mr. Robert Strauss
15 and Tim Kraft and others, we--our position in relation to
16 the coordination of the campaign, Franklin had alleged that
17 he was designated, that he received a telegram.

18 Then I--in that meeting in Washington I reminded
19 Mr. Strauss that--what had been said in Puerto Rico by
20 Franklin. And then he told me, my signature is not on that
21 telegram. And he repeated it twice. And then I asked Mr.
22 Kraft, do you have a copy of the telegram. Yes, I have it.

23 I think the next day--I'm trying to go to my
24 memory. We went to Tim Kraft's office at the same head-
25 quarters and he showed us the copy of the telegram, and

1
2 it was under Tim Kraft's signature.

3 Q Appointing you--

4 A No, appointing Franklin--not appointing
5 Franklin, saying that he was very pleased--

6 Q Oh, I see. Okay.

7 A Saying that he was very pleased to know that
8 he, Franklin, was accepting the coordination.

9 But I don't know if he was named or not. We
10 alleged that he was not appointed campaign coordinator.
11 So, we came back to Puerto Rico, and I told you what we did
12 in relation to this.

13 Q Okay. Do you still maintain any records in
14 your capacity as campaign coordinator for the 1980
15 primary of--

16 A No. No.

17 Q You have no records left?

18 A No.

19 Q Where did they go?

20 A No, because we don't have records. I was
21 just made campaign coordinator. And I have the checks--the
22 bills, in my office I could have the bills from the telephone
23 company and the Puerto Rico Communications Authority.

24 But I don't have records, because I just--my main
25 work was field work.

1
2 Q For example, did you maintain a copy of this
3 letter that has been identified as FEC Exhibit 1?

4 A Yes. And I sent it with my previous
5 deposition, the copy of it.

6 Q You stated earlier--you testified earlier
7 that this was in reply to a letter or a communication from
8 Mr. Perez Rodriguez.

9 A Yes. I think, I think, I am not quite sure.

10 Q But you don't have a copy of his--

11 A No,--

12 Q --communication to you?

13 A --no, I haven't.

14 But I think that he wrote me a letter, because
15 two years have passed and I have been working as Speaker,
16 working in the local politics, working with this, and I
17 have my hands full.

18 Q All right.

19 A And I think he wrote me a letter, and I
20 answered--and my answer was this one, which is the exhibit
21 you have already--

22 Q Right.

23 A --I have already translated.

24 Q Let's go back to the meeting which Franco
25 has testified to. And we also had testimony yesterday from

1
2 Mr. Adalberto Jurado.

3 A Yes.

4 Q Mr. Jurado testified, if my recollection is
5 correct, that he received a call from somebody connected
6 with your office in connection with Komite Amigos de Jimmy
7 Carter. That he was called about taking the position as
8 treasurer by someone in your office.

9 MR. WHITEHEAD: Is that his testimony?

10 MS. CALLAHAN: That's right.

11 THE DEPONENT: I don't know if somebody in
12 my office called him.

13 Mr. Jurado is a good friend of Senator
14 Efrain Santiago. And he used to go to his office,
15 and he is a member of the New Democratic Party and
16 the New Progressive Party. He is a good friend of
17 ours.

18 Maybe somebody called him.

19 BY MR. WHITEHEAD: (resuming)

20 Q But you--

21 A But what I am telling you is I don't know.

22 Q Do you recall Senator Efrain Santiago at that
23 meeting suggesting Adalberto Jurado for the treasurer of
24 Komite de Amigos?

25 A No, I don't recall that.

1 Q Franco testified that is what happened.

2 A It could have been that way, but I can't
3 remember.

4 Q Was Efrain Santiago there at the meeting?

5 A I think he was, yes.

6 Q And it is entirely possible that Mr.--or
7 Senator Efrain Santiago suggested Mr. Adalberto Jurado as
8 treasurer of the Comite?

9 A It could be possible. Yes.

10 Q Did the name Comite Amigos de Jimmy Carter
11 come up at that meeting as a name?

12 A No.

13 Q Did Mr. Jurado come to that meeting at a
14 later time; that same meeting?

15 A Not to my recollection.

16 Q Is it possible that he could have appeared
17 at that meeting?

18 A I don't think so, because that was a meeting
19 in relation to the media and the organization of the
20 campaign with the media, and I don't think that he had
21 anything to do in that meeting.

22 And I don't think that he came to that, to the
23 best of my recollection.

24 Q My recollection of Mr. Jurado's testimony
25

1
2 was that he received a call from your office, someone in
3 your office, the night of that meeting, and he was to come
4 by and get forms, Federal Election Commission forms, from
5 your office, which he did, and at which time he was told the
6 officers of the Komite Amigos de Jimmy Carter.

7 Do you recall this now?

8 A No, I don't recall.

9 Maybe somebody had called him from my office,
10 because I had many assistants, many people working for me.

11 But I don't recall.

12 It could have been that way, but I don't exactly
13 remember that. And I don't know if somebody from my office
14 called him. He could have been called by somebody in my
15 office.

16 Q This exhibit has already been marked as FEC
17 Exhibit 1, but it will be attached to the Jurado deposition
18 to distinguish it from exhibits in this particular deposition.

19 Let me show you, Mr. Viera Martinez, a copy of
20 a statement of organization of a political committee on an
21 FEC form, which has been filled out and testified to by Mr.
22 Jurado.

23 I show this to you now.

24 Do you maintain such FEC forms at your office?

25 A No, I don't.

1
2 Q Mr. Jurado testified that he went to your
3 office to get these forms because that was the only place
4 he could get them.

5 A It is a possibility, because when we were
6 informed about the Federal Election Commission law and the
7 provisions of it in relation to the Komite Amigos de
8 Jimmy Carter, maybe somebody from the Carter-Mondale
9 Committee, maybe Buddy James, maybe Terry O'Connell, maybe
10 somebody had brought some forms, because I didn't have
11 forms because I had requested forms in any way from the
12 Carter-Mondale Committee or from any other person, because
13 we were briefed that we could not be in any way related
14 with the Komite Amigos de Jimmy Carter.

15 Q Who briefed you on that?

16 A Well, I told you, Terry O'Connell and
17 Buddy James.

18 Q And possibly at that meeting of February
19 18th?

20 A I told you possibly at that meeting and
21 possibly before--

22 Q Right.

23 A --maybe in one of the visits of--

24 Q One or both.

25 A Or both, that's right.

1
2 Q Now, it's your testimony that you don't
3 have this type of form at your office.

4 Is it possible that these forms for political
5 committees, organization of a political committee, were
6 given to you by either Mr. James or Mr. O'Connell?

7 Jurado says he gets it from your office.

8 A Well, it could have been. Or maybe somebody
9 else in my office may have gotten those forms.

10 But what I told you is that I didn't request
11 from the Carter-Mondale or from anybody else forms like this.

12 Q You did not request them?

13 A No, because--

14 Q Okay.

15 A --I didn't have anything to do with them.

16 I was the campaign coordinator and I could not
17 be involved in any way with any independent committee.

18 Q Let me--

19 A Except for one--just for one purpose, in
20 relation to anything I could have mentioned before.

21 I had to look out that the people engaged in the
22 Carter-Mondale Committee could have observed the instructions
23 and the law as it had been briefed to us, that an
24 independent committee had to be absolutely independent.

25 Q Let me point out to you that FEC Exhibit 1,

1
2 attached to Viera Martinez's deposition, bears a date
3 of 19th, February, 1980.

4 Let me point out to you that Exhibit 1 attached
5 to Jurado's deposition bears the same date, February 19th,
6 1980.

7 A Yes, I see it.

8 Q Now, can you in any way account for that
9 fact, in that you were writing to Mr. Perez Rodriguez, and
10 with a carbon copy to Mr. Jurado on the same date that they
11 were forming the political committee?

12 A Well, --

13 Q The statement of registration, at least.

14 A Well, it may be, I'm not sure of that, that
15 they had formed the committee and they wrote me on the same
16 day and immediately I answered his letter.

17 Q Is it possible that you heard of the Comite
18 prior to this--Comite de Amigos, prior to this date?

19 A It could be possible that somebody could have
20 told me that they were forming a committee.

21 Q Who?

22 A No, somebody. Maybe Efrain Santiago, maybe
23 Jurado, maybe Rodriguez, maybe somebody else, somebody in
24 my office.

25 But as I remember, I replied--as I remember, to a

1
2 letter written by Mr. Rodriguez.

3 That's the best of my recollection; informing
4 me of the creation of this committee. It could have been
5 done the same day. That's the only information I can give
6 you.

7 Q Let me ask you this. How long have you
8 known Perez Rodriguez?

9 A I guess for many years, and he lived in the
10 same condominium where I live, the Laguna Terrace
11 Condominium at the address I gave you.

12 Q 403 Del Parque Street?

13 A I beg your pardon?

14 Q 403 Del Parque Street?

15 A No, I think he has his offices there, law
16 offices. I haven't been there, I have never been there,
17 but he resides in the same condominium where I reside with
18 my family, in the same building.

19 Q How about Julio Juan Garcia; do you know
20 him?

21 A Julio...?

22 Q Julio Juan Garcia, Ashford 1485.

23 A Yes, I know him. He is one of the leaders
24 of the New Progressive Party in precinct number one. He
25 is a Democrat and he has been active in the New Progressive

1 Party, and I know him.

2
3 Q Do you have political dealings with him on
4 occasion?

5 A Very seldom occasions. In relation to the
6 New Progressive Party.

7 Q How about Antonio Alfonso, Number 1687 Lilas,
8 Urbanization San Francisco, Rio Piedras, do you know him?

9 A Yes, I know him--I knew him, because he
10 passed.

11 Q He's dead?

12 A Yes, in an automobile accident.

13 Q Um-hum.

14 A And I knew him for many years. He was a
15 pioneer in radio, and he was the under-secretary of the
16 House of Representatives.

17 He passed away--he passed, I think last year or
18 the beginning of this year, an automobile accident, his
19 own automobile.

20 Q In connection with this letter that you
21 wrote to Mr. Perez Rodriguez on February 19th, 1980, to
22 your knowledge, who, in the Carter-Mondale Presidential
23 Committee knew of this letter? Dovellet? O'Connell?

24 A Yes, I think Dovellet, O'Connell. It could
25 be McKauliff, too.

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Q McKauliff, how do you spell that?

A He worked for the finance committee in the Carter-Mondale.

Q How is that spelled? Capital M-A-C...?

A M-C-K-A-U-L-I-F-F. I think that's McKauliff.

Q He could have known of the existence of this letter?

A Could have, but I'm not sure.

But I'm more sure that Terry O'Connell and Evan Dovelie knew about that letter.

Q At what time?

A I don't know if it was shortly after I wrote it or somewhat later.

Q Did you give them copies or show them the letter?

How did the come to know about the letter?

A I think I told them. If I would have sent them a copy of that--

Q I know. I understand that.

But you are stating that they knew of the existence of the letter.

A I told you that maybe I told them about the-- my letter to Rodriguez, saying that the committee was a non-

1
2 authorized committee.

3 Q Did you show them the letter, do you remember?

4 A It could have been that way, too.

5 I don't know, exactly.

6 Q All right.

7 A I don't remember, exactly.

8 Q Was it your idea to write this letter?

9 A It was my idea, because I had been briefed
10 that the independent committee, it cannot be in any way
11 related with the Carter-Mondale.

12 And I had to comply with the law, and that is the
13 way I always work.

14 Q Is it your testimony that it was in response
15 to something you received?

16 A Yes, I am almost sure that it was in response
17 to a letter. But I can't be absolutely sure.

18 Q How big a staff did you have in the
19 Speaker's office?

20 A Well, I had about six secretaries, could be
21 from eight to twelve assistants, head of staff--chief of
22 staff, and others.

23 It could be around fifteen to twenty persons.

24 Q I can't recall recall--well, it's a redundant
25 question, let me ask it again.

1
2 How did you come to know of the existence of
3 the Comite Amigos? How did this come about?

4 A Well, I told you that--

5 Q I may be asking this again.

6 A Yes.

7 Q My memory is a little--

8 A I told you that I almost--I'm almost sure
9 that I received a letter, although I could have heard
10 about the formation of this committee before.

11 But I received--to the best of my recollection I
12 received a letter from attorney Manuel Perez Rodriguez,
13 and this letter, my February 19th, 1980 letter is in answer,
14 to the best of my recollection, to his letter.

15 Q Would it be after you became the campaign
16 coordinator for the Carter-Mondale Presidential Committee?

17 A It was after, yes.

18 Q It was not before; it was after?

19 A Well, after, yes, because--

20 Q All right.

21 A --the only way I could have written him was
22 as campaign coordinator.

23 Q Did you have any discussions with anyone about
24 writing this letter; the reason for writing it, the
25 necessity for writing it?

1
2 A I don't think I had discussed it with
3 anybody, because as I told you, we were briefed--I was
4 briefed that the independent committee cannot be in any
5 way mixed with the Carter-Mondale Committee and the
6 campaign.

7 Q You stated that the committee--that is, the
8 Carter-Mondale Presidential Committee activities here in
9 Puerto Rico were carried out mostly by volunteers.

10 Do you have any idea of the number of volunteers
11 you had?

12 A Hundreds.

13 Q Hundreds?

14 A Let's start with the congressional district
15 coordinators. We have two in each congressional district.

16 Q You testified earlier about that.

17 A They are volunteers.

18 Q Right.

19 A Then take the twenty-five delegates from
20 each congressional district. They are all involved in the
21 campaign as volunteers.

22 We have mayors, representatives, senators who
23 are Democrats. The employees, the members of the precincts
24 committee of the local party, the New Progressive Party,
25 because they happen to be Democrats, the majority of them.

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1
2 Q Did you have any conversations with,
3 discussions with, or directions to any of these volunteers
4 about Comite Amigos de Jimmy Carter and its relationship
5 to the Carter-Mondale Presidential Committee?

6 A I told them, everywhere I went, that the
7 Carter-Mondale Campaign Committee was a different--although--
8 from Amigos de Jimmy Carter, although they--we had the
9 same goal, the Carter-Mondale Committee and the Amigos
10 de Jimmy Carter, trying to re-elect the President.

11 And besides that, we had the same goal, trying to
12 defeat the--to have the re-election of President Carter,
13 and it was an internal fight between PNP, the New Progressive
14 Party people against PDP, the Popular Democratic Party,
15 locally.

16 Q And what did you tell these people?

17 A That the campaign, in relation to issue,
18 should be a positive one, because I don't like, personally,
19 negative campaigning.

20 And the instruction, at least for Puerto Rico,
21 was in relation to--not to have negative campaigning in
22 relation to the candidates.

23 And I personally would have rejected any negative
24 campaigning, because I don't use--I don't like negative
25 campaigning is negative to the ones that use it.

1
2 That's my way of thinking.

3 Q Did you--

4 A And I also explained all the system to
5 select the delegates, the proportional rules of the
6 Democratic Party, that, for example, if any candidate had
7 over twenty-five thousand or more they were entitled to
8 this--in the same proportion, to delegates to each one of
9 the congressional districts.

10 And that's why in the primary--although we won
11 the primary, Mr. Carter obtained twenty-one votes and
12 Senator Kennedy twenty, and I headed the delegation to the
13 convention, the 1980 convention.

14 Q Did you issue any written directions to the
15 volunteers?

16 A No.

17 Q Any kind of written direction as to Comite
18 de Amigos/Carter-Mondale Presidential Committee?

19 A No, no, I don't, no, because we--our
20 campaign is based on local organizations. And we used the
21 organization of the Democratic Party in those--everywhere
22 where we have the local committees of the New Progressive
23 Party whose members were Democrats.

24 And where there were Republicans, we didn't use
25 the Republican leaders. We used the Democrat leaders. And

1
2 almost all the committees were controlled by members of
3 parties who were Democrats.

4 We used rallies, motorcades, house-to-house,
5 small gatherings in different homes. We organized all
6 that, and we didn't write.

7 We didn't used to write, even in local politics,
8 except if there are specific instructions for any event,
9 as for example, now we are going to have, on November 14th,
10 the general assembly or caucus of the New Progressive Party
11 to select the vice-president of the New Progressive Party.

12 I am the only candidate. Although we--

13 Q It's like a tough election.

14 A Yes. Although we give thirty days if
15 anybody wants to file his candidacy.

16 And on December 5th we have a telethon to raise
17 money, to raise funds for the New Progressive Party.

18 So, we--when these events come, the headquarters
19 of our party give written instructions to the different
20 committees, the different leaders in all--all over the
21 island.

22 You know, we have just an island of thirty-five
23 hundred square miles. You can go over the coastline in a
24 motorcade just in three days. It's takes you just six
25 hours, more or less.

1 Q Are you familiar with the radio marathon
2 that was conducted by the Comité de Amigos?

3 A Yes, the radio marathon was announced, it
4 was advertised and I know that the celebration of this
5 radio marathon was done.

6 Q Were you involved in any of the decisions
7 pertaining to the radio marathon?

8 A No.

9 Q Were you involved in any of the decisions
10 pertaining to the advertising surrounding the radio
11 marathon?

12 A No, no.

13 Q Do you know how much money was raised by that
14 radio marathon, at all?

15 A No, I don't know that.

16 Q You state in previous submissions to the
17 Commission, by way of affidavit, that you were never present
18 in any meetings with Joe Franco or anyone connected with
19 Franco & Associates at which Jurado was present; Adalberto
20 Jurado, is that correct?

21 A I would like to see that statement.

22 MR. WHITEHEAD: I'll tell you what.

23 Why don't you familiarize yourself with
24 those documents, because there may be a line of
25 questioning on that. And we'll take a brief break.

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(Short recess.)

MR. WHITEHEAD: All right. Back on the record.

Let the record show that Mr. Vieras has been reviewing a set of questions directed to him by the Federal Election Commission in connection with this matter, and his answers to those questions dated August 20th, 1982.

BY MR. WHITEHEAD: (resuming)

Q All right.

Now, returning to the question. You state that you were never present at any meetings with Mr. Franco or-- or at Franco & Associates with members of Franco's staff--

A Yes.

Q --at which Adalberto Jurado was present; is that correct?

A The question, in the questionnaire sent to me, question number fourteen, it says: Were you present at any meetings with Joe Franco & Associates at which Adalberto Jurado and/or Manuel Rodriguez or any other agent of Komite Amigos was present, please detail your response.

Q Correct.

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A My answer was no, sir.

Q Okay.

A Let me qualify it.

The question refers to meetings, and I understand meetings where you are discussing problems, but it doesn't mean that at any time, which I have been in Joe Franco's office, but even Adalberto Jurado or Manuel Rodriguez, or somebody, Efrain Santiago or Virgilio Ramos or somebody could not have been there.

Q So, is it now your testimony that it is possible that you were in Joe Franco's office at some point in time, or another, at which Adalberto Jurado was there, Perez Rodriguez was there, Efrain Santiago was there?

A No, no. It could have been Adalberto Jurado, but not in meetings, because I used to go to Joe Franco's office, because he handled my personal campaign and we often got together to discuss different problems.

Q Were you running for election in 1980?

A Yes, I was running in 1980.

Q In January and February?

A Yes.

Q As part of the primary?

A No, no, in local politics.

Q I understand.

1
2 A Because I was an at-large candidate to the
3 House of Representatives.

4 Q We're talking about a general election in
5 November, are we not?

6 A Yes.

7 Q Was your campaign for that general election
8 and the seat in the House of Representatives active in
9 January or February of 1980?

10 A Let me tell you something: we start
11 campaigning the next date of the election, for the coming
12 election.

13 And by 1980 we were already in campaigns in
14 local politics, because--

15 Q Were you utilizing the services of Joe
16 Franco & Associates as early as January or February of
17 1980?

18 A I have always used him.

19 Q Was he conducting any advertising campaign
20 for you in January?

21 A Not by that time, the campaign itself. But
22 I always use him, even out of an electoral year, maybe for
23 any event I have, for just placing an ad in the paper or
24 something like that.

25 And besides that, other candidates; Efrain

1
2 Santiago and other candidates use him as the advertising
3 agency. And in any occasion we may have coincided.

4 Q To your knowledge, did either Adalberto
5 Jurado or Perez Rodriguez or Viera--no, I'm sorry--Perez
6 Rodriguez, ever engage in campaigns of their own?

7 A No.

8 Q Did they ever run for office?

9 A No.

10 Q So, is it correct to say that they were
11 only involved in political campaigning on behalf of
12 Comite Amigos, to your knowledge?

13 A Yes, to my knowledge, because although they
14 are New Progressive Party members, they just help in the
15 campaign when we need help.

16 But they didn't run for office, nor were they
17 campaigning in 1980, at that time. They are people who
18 help.

19 Q Right. Volunteers.

20 A Volunteers.

21 Q All right.

22 Franco has stated that you and other Carter-
23 Mondale representatives were present at at least one
24 meeting in which verbal contracts were discussed, and Franco
25 recalls Jurado being present.

1
2 Does this refresh your recollection about such
3 meeting?

4 Now we are talking about verbal contracts
5 involving you, Carter-Mondale representatives and Jurado
6 was present.

7 Do you recall such a meeting?

8 A No, I don't recall being in a meeting with
9 Jurado and Joe Franco. I don't recall that.

10 It could have--maybe we have coincided in the
11 same room, in the same building.

12 Q Do you remember, maybe, Mr. Jurado being
13 in another--

14 A Could have been.

15 Q --suite of offices?

16 Do you remember seeing him there?

17 A It could have been.

18 Q You can't say yes or no? You can only say
19 it could have been?

20 A Yes, I can't say yes or no, because what
21 you are telling me--you are asking me about a meeting. And
22 I often sat down with--

23 Q But then it is your testimony that there
24 was no meeting where Jurado was present where contracts
25 were talked about in connection with the Carter-Mondale

1
2 Presidential Committee activities with Franco?

3 A No, because the Carter-Mondale contracts or
4 services were asked just by Evan Dovelie, not even by me.

5 Q Were you at those meetings with Franco and
6 Dovelie where the contracts were discussed?

7 A I think I could have been in maybe one or
8 two occasions, maybe, but--

9 Q Do you remember being there?

10 A Yes, I remember I have been there, yes.

11 Q Do you remember the discussions about the
12 contract?

13 A No, not the terms of the contract, because
14 he came just for the hiring the services of the agency.

15 I didn't have any authority to hire the
16 advertising agency services for the media.

17 Q Do you remember any conversations where
18 Dovelie said to Franco, this is how much money you have;
19 this is what we want you to do; this is the type of
20 campaign we are going to run?

21 Where you were present, where you were sitting
22 there when Mr. Dovelie was talking to Mr. Franco?

23 A Yes, but not with Mr. Jurado.

24 I just--I think that's correct that at one point,
25 maybe, Mr. Dovelie and Joe Franco and I, because Mr. Dovelie

1
2 was the person authorized to hire the services, but I
3 was the campaign coordinator.

4 Q But it's your testimony that Jurado was not
5 present at these meetings?

6 A I don't recall him being present. He has
7 nothing to do with anything in relation to the Carter-Mondale
8 campaign.

9 Q Do you recall him being there when Mr.
10 Dovellev was telling Mr. Franco, this is what we are going to
11 do; this is how much money we have?

12 A I don't recall. That's what--

13 Q But that's your definition of a meeting?

14 That's what you are saying a meeting is all about?

15 A discussion--

16 A Yes, a meeting is a discussion of a problem,
17 when you and I and somebody else meet to discuss. That's a
18 meeting.

19 Q But you don't recall him being there at
20 these meetings?

21 A No, no. What I don't recall is Jurado being
22 there. But I think that in maybe one instance or two, when
23 Dovellev had been with Joe Franco discussing the services, I
24 think I have been there, with Evan Dovellev.

25 Q You were?

1
2 A Yes. But no, I don't recall Jurado being
3 in that discussion.

4 Q How about Perez Rodriguez?

5 A Either, Perez Rodriguez. I don't remember
6 him being there.

7 I don't think they have been there in the
8 discussion of any contract in relation to the Carter-
9 Mondale Committee, campaign committee.

10 Q All right.

11 We have received testimony that Jurado says that
12 you were at--and other Carter-Mondale representatives were
13 present with him in at least one meeting in which verbal
14 contacts were discussed.

15 Does this refresh your memory about this incident
16 at all?

17 A No, it doesn't refresh my memory because--

18 Q You say it didn't happen?

19 A I beg your pardon?

20 Q Could you say that it did not happen?

21 A No, I said--and here is my conclusion, that
22 since all affairs related to the Carter-Mondale Committee
23 were exclusively of the Carter-Mondale, and Jurado didn't
24 have any--

25 Q But my question was, could you state that it

1
2 did not happen, Jurado being present with you and other
3 representatives in which these contracts were discussed?

4 A Well, it could not have happened, being him
5 there, for in--in the discussion as part of the matter.

6 It could have been possible that he coincided in
7 the same agency, for his affairs with the Comite de Amigos
8 de Jimmy Carter.

9 Q So, actually, what you are saying, in effect,
10 is that he was not there during any meetings where verbal
11 contacts were discussed, at which you were present and
12 Carter-Mondale representatives were present?

13 A What I am saying is that he could not have
14 been in the discussion, in the meeting, discussing the
15 affairs of the Carter-Mondale.

16 Q Could he have been sitting there?

17 A Could have been.

18 Q In the same room, while the discussion was
19 going on?

20 A He could have been, but I don't remember.

21 Q You do not recall. Okay.

22 A But what I am sure is that nobody, out of
23 Evan Dovellet and Joe Franco and the people engaged in the
24 Carter-Mondale, could have intervened in the discussion of
25 the campaign or the use of the media or the agency services.

1
2 Q Franco says that he met with you and Dovel
3 on almost a daily basis to discuss the Carter-Mondale
4 strategy and Comite de Amigos.

5 Does this refresh your memory at all?

6 A No.

7 Q Did this happen?

8 A No. On a daily basis, we cannot--

9 Q Almost on a daily basis.

10 A No, no, I told you that I visited him often,
11 but not on a daily basis. I was campaigning and organizing
12 the work.

13 I could not meet him on a daily basis, but I say
14 I often met with him, or his people.

15 Q He's talking about discussing the Carter-
16 Mondale strategy and the Comite de Amigos strategy.

17 A No. Let me tell you something.

18 I was the--had the responsibility as coordinator
19 of the Carter-Mondale campaign, and Joe Franco was the
20 person in charge of the Carter-Mondale advertising part of
21 the campaign, on the basis of the services asked by Mr.
22 Evan Dovel.

23 And he was, also, in charge of the advertising
24 of the campaign of the Comite Amigos de Jimmy Carter.

25 But as campaign coordinator, I was responsible to

1
2 everything within the limits of the law, the federal law,
3 and the instructions I had received, and the briefing I
4 had received.

5 And when he prepared the spots--because we relied
6 on his experience, and as I told you before, he is, I think,
7 the best in political campaign publicity.

8 He showed me, represented me the spot he had for
9 the Carter-Mondale and the Amigos de Jimmy Carter.

10 Q Do you remember what that looked like, what
11 that spot was like?

12 We've seen some of his advertising. I was just
13 wondering if you remembered.

14 A Yes. Well, I think there is a lady singing
15 from an automobile. Now, she is the wife of one of the
16 representatives.

17 Like in a motorcade, or something like that.

18 Q Was the governor involved?

19 A There is another one, but I think that was
20 placed by Carter-Mondale and I think that was taken in
21 Juncos in a hand-to-hand shaking on one of the streets of
22 Juncos.

23 I think I accompanied the governor on that. To
24 the best of my recollection, this was arranged by Pedro
25 Rivera Casiano, who is--

Q The governor's aide.

And the others taken in the--as I remember, in front of where we had the Carter-Mondale headquarters, in Manua Rivera Avenue. Because I had two flags with bulbs, electrical bulbs; the American flag and the Puerto Rican flag, and we have that on top of the building.

And I remember that t.v. spot because of the flags.

Q Do you remember your being in that particular advertisement?

A No, I haven't been there.

Q Do you remember an advertisement--is this the one--to your knowledge, is this the one that you paid for, or was it paid for by or arranged for the payment for-- by Evan Dovelie or someone connected with the Carter-Mondale Presidential Committee?

The one in which the governor is in the streets campaigning?

A In Juncos.

Q In Juncos.

A I think so. And I think I am accompanying the governor in that occasions.

Q All right.

A Not on the other ones. Not in the other spots.

1
2 Q What was the other spot?

3 A What I am telling you, the one taken around
4 the lagoon on one of the marginal streets, the Condado
5 Lagoon, close to the Flamboyán, and the Holiday Inn.

6 Q Do you remember a television advertisement
7 in which the governor and yourself, in fact, are involved
8 in shaking hands with President Carter in the White House?

9 This was part of the campaign.

10 A Yes. And that's the t.v. spot I am referring
11 to. Part is taken in Juncos. I think it was in Juncos, in
12 the street. The governor is shaking hands. I think that
13 I am behind him somewhere shaking hands.

14 Q No, that's not the one.

15 A There is another one in which the governor
16 appears, or the same, I'm not quite sure, shaking hands with
17 the President, and I am shaking hands with the President, too.

18 Because that was something taken in the White
19 House, because President Carter didn't come here.

20 Q That's right.

21 A Now, the only person from Carter that came
22 here, to the best of my recollection, is Hugh Carter, his
23 nephew.

24 Q Do you recall viewing any television advertising
25 prior to approving it as committee campaign coordinator?

1
2 A No, I didn't approve. I just--whenever
3 Joe Franco had something, because he created all this,
4 and everybody relied on his experience, he called me to
5 see the t.v. spot, and I asked him to call me because I just
6 wanted that if he had a t.v. spot in relation to Amigos de
7 Jimmy Carter, that this spot won't be related with Carter-
8 Mondale.

9 And besides that, I wanted to see that the spot
10 won't be against the direction--the instructions I had of
11 a positive campaign.

12 Q Not negative; positive?

13 A Not negative.

14 Q Franco has stated in an affidavit that both
15 you and Dovelie supplied all resource materials and approved
16 all ads for both the Comite Amigos and for the Carter-Mondale
17 Presidential Committee here in Puerto Rico.

18 A I didn't have material.

19 Q All right.

20 That's a two-part question: you state that you
21 didn't have any resource materials to supply him. Is that
22 your testimony?

23 A Right.

24 Q Did you approve ads, as he has stated in his
25 affidavit, for both committees; Comite Amigos and Committee--

1
2 A No, no, no, not approved, because I just
3 saw the spot, the ads, just to see if--as if I were
4 supervising.

5 Q Which ads?

6 A Both ads.

7 Q From Comité Amigos?

8 A To see that the ads or the t.v. spot would
9 conform to the law that the Carter-Mondale campaign has
10 nothing to do with the other one. So that they won't be
11 mixing the Carter campaign--

12 Q Where did you see them?

13 A In Joe Franco's office.

14 Q You viewed these before they were placed on
15 television; is that it?

16 A Yes.

17 Q And you, in effect, had some input, some
18 decision into what was there? I mean--

19 A No decision. If I would have seen something
20 which would have mixed the campaign of the Amigos de Jimmy
21 Carter with the Carter-Mondale, I would have said that it
22 could not be placed because it is not in conformity with
23 the federal law.

24 Q But, in effect, you did approve--

25 A Not that I approved. I would have just

1
2 remarked to him if that would have been the case, well, this
3 you cannot--you cannot present this because that mixes
4 the Amigos de Jimmy Carter with the other, but it happened
5 that as he knew and he was instructed in that way, that
6 the Comite Amigos de Jimmy Carter campaign could not be
7 in any way connected with the Carter-Mondale campaign.

8 Q Who gave him those instructions?

9 A I told him.

10 Q Anyone else told him?

11 A Maybe Evan Dovelie. Maybe Terry O'Connell.

12 But all of these spots, I saw all of them, were
13 absolutely separated.

14 Q Why did you get involved with Comite Amigos
15 advertisement if they were a separate entity according to
16 your testimony?

17 Why would you get involved?

18 A Not that I was involved. I wasn't involved,
19 but, for example, if they could have said in a spot that
20 the campaign Amigos de Jimmy Carter was an addition to
21 the campaign of Carter-Mondale, I would have said you cannot
22 do that.

23 But the spot that I saw, because he called me or
24 I went to his office on my own, and he said Angel, see what
25 I have. Because he created --I see what he always do in all

1
2 the campaign for one candidate, for another candidate,
3 just to confer, and when he has something created for
4 the Amigos de Jimmy Carter he used to call me, or for the
5 Carter-Mondale he used to call me just to see them, his
6 creation.

7 Q Did anyone go with you to see these things?

8 A When I went, I went by myself.

9 Q Did O'Connell go?

10 A No.

11 Q Did Dovelie go?

12 A I don't know.

13 Q With you?

14 A Not with me.

15 Q They were not present with you at any time?

16 A Not with me.

17 Q Do you have any knowledge of their being
18 there and viewing that type of advertisement at any time?

19 That's Amigos--

20 A I don't have any knowledge. They could
21 have been there.

22 Q You don't have any knowledge of it?

23 A I don't have any knowledge of it.

24 Besides that--let me--we had different issues.

25 I just wanted to conform the campaign, the Carter-

1
2 Mondale, to the issue, and that was my responsibility.

3 Q What is the issue?

4 A For example, the Carter foreign policy
5 in relation to the Middle East, in relation to the Pan-
6 American treaty, in general terms. That's something that
7 we didn't use except in rallies we say President Carter
8 signed the treaty with Panama, President Carter was
9 decisive factor in Middle East settlement.

10 Q You didn't use it in any of your campaign
11 advertisements?

12 A No. Besides that, I didn't want any negative
13 campaign against Senator Kennedy.

14 Q Let me ask you this, then.

15 Joe Franco has testified that he prepared a
16 radio advertisement on behalf of Comité Amigos de Jimmy
17 Carter, and what he did was take the end of a Senator
18 Kennedy advertisement in which in Spanish Kennedy said,
19 on to victory.

20 All right. And because in Spanish, I am told
21 victory and defeat are very close in terminology and in
22 expression, he gives the radio advertisement to Kennedy's
23 defeat in earlier primaries in the United States prior to
24 the Puerto Rican, changed the word to fit and engaged--used
25 an actor and when it came out, on to defeat.

1
2 Do you remember that radio--

3 A Yes. And that was Amigos de Jimmy Carter
4 radio ad.

5 Q He testified that he showed this
6 advertisement or he had this advertisement played for
7 Terry O'Connell.

8 A I don't know about that.

9 Q And he says that Terry O'Connell says, it
10 sounds good, let's use it.

11 Were you--or words to that effect, we will use it.

12 Were you at a meeting in which that was played
13 for you and for Terry O'Connell?

14 A No, no. I don't remember I have been in a
15 meeting where that will have been played.

16 Q Listened to--

17 A Listened to. I don't recall, but Joe Franco
18 told me about that, and I heard by radio, it says Kennedy
19 came here and he said "a la victoria" and then Joe Franco,
20 that was the last minute, that was close to the March 16th
21 primary, and then he said, with a voice whom I don't know
22 who it was, "a la derota" with the English accent in the
23 Spanish words.

24 And I heard it, but it was Comite Amigos de Jimmy
25 Carter, and I think it was a few days before the primary, after

1
2 the day that Senator Kennedy came to a big rally of the
3 Popular Party where he referred to, in that meeting, to
4 being in the White House, and Hernandez Colon, the
5 governorship of Puerto Rico.

6 And he ends his speech with "a la victoria,"
7 and that is where Joe Franco--and that's his imagination
8 created that for the Amigos de Jimmy Carter, saying
9 "a la derota."

10 That means victory and defeat.

11 Q Is it your testimony that you were not
12 present when the proposed radio advertisement was approved
13 for--to be heard on the radio?

14 A I heard it, but I didn't approve anything
15 for Amigos de Jimmy Carter.

16 Q I understand your testimony, but did you
17 hear the radio jingle prior to it being disseminated on
18 the radio?

19 A Yes, I could have heard prior because--

20 Q Where would you have heard it?

21 A In Joe Franco's office.

22 Q Would you be alone, or with anybody else?

23 A No, alone.

24 Let me tell you, Mr. Whitehead, Joe Franco and
25 I are very good friends and when he has something related

1
2 to political campaigns or not, and he has something that
3 thinks it is good, he talks to me. We are very good friends,
4 even not in politics, and not any other things, days pass
5 and we don't get together, we say let's have coffee and I
6 go to his office and he says, let me show you, Angel,
7 something that I have for some commercial, this commercial
8 for this firm.

9 Let me show you this. How do you like it?

10 And I say, well, beautiful, that is good; I don't
11 like it.

12 That happens very often, even with commercials
13 that have nothing to do with--because we are friends.

14 Q All right.

15 A And another thing, in Puerto Rico, you know,
16 everybody knows you, and you go along the street and you
17 find Adalberto Jurado and Perez Rodriguez and you find
18 everybody and you say hello, and because we have met for
19 years and this is a very small island.

20 And Joe Franco is one of the most sympathetic
21 persons in town with everybody and he's a very good friend,
22 and his friendship is--we are honored with it.

23 Q Franco has stated in an affidavit, not in
24 his testimony, in depositions, but that his company prepared
25 material for one campaign, that is Amigos de Jimmy Carter,

1
2 and the Carter-Mondale presidential campaign, or Carter-
3 Mondale presidential campaign, and it was used by the
4 other campaign.

5 Do you have any knowledge of this?

6 A No, I don't have it. No.

7 Q Do you--in addition to the twenty-five
8 thousand dollars that we talked about earlier in this
9 deposition, do you have any further knowledge of what the
10 Carter-Mondale Presidential Committee proposed to spend in
11 Puerto Rico on its campaign for the primaries?

12 A No, I don't know. The only thing I was
13 told was just that we were assigned twenty-five thousand
14 dollars.

15 And I told them we could not make a campaign
16 like that with twenty-five thousand dollars.

17 And I mentioned him--

18 Q This is whom you are talking to; Dovellet?

19 A No, to Terry O'Connell and Evan Dovellet,
20 too, when he came, because Dovellet came maybe two or three
21 weeks before the primaries.

22 And I mentioned him the cost of the internal
23 primary of the Democratic Party, 1978, where we used Joe
24 Franco and Associates.

25 Q In which you used two hundred thousand dollars?

1
2 A That's correct.

3 As a matter of fact, we raised--but specifically,
4 with O'Connell and other people, not by me, personally,
5 but in the Carter-Mondale headquarters in the part that I
6 have rented to Carter-Mondale Committee, an amount of
7 money, I don't know, but it was substantial amount for the
8 Carter-Mondale Campaign Committee, in the nation, not in
9 Puerto Rico.

10 Q In Washington, D.C.?

11 A Yes, because I was briefed that way, anything
12 that was raised for Carter-Mondale Committee has to go to
13 Washington.

14 Q Right.

15 A And they could have--then they could have
16 used that money for the campaign everywhere.

17 Part of them could have been in Puerto Rico.
18 That's why Evan Dovelie came and he ordered services, and
19 he was the only one, to my knowledge, that was authorized
20 to order any services, although people from the governor's
21 office intervened just to try to get the right t.v. spot in
22 relation to the campaign.

23 That's why in my--to my knowledge, in my
24 recollection, Pedro Rivera Casiano was the person who
25 arranged that t.v. spot in Juncos where the governor is

1 shaking hands.

2 Q I want to get to that particular thing.

3 Franco has testified that towards the end of
4 the campaign--I am talking now in relation to the Carter-
5 Mondale Committee activity, that he felt that it was very
6 close and that one further effort would put it over.

7 He testified that he was authorized, as I recall,
8 a sum of about thirty-seven thousand at that point, some-
9 where in that neighborhood.

10 He proposed this particular advertisement and it was
11 Virgilio Ramos that kind of coordinated on behalf of the
12 government.

13 This was the advertisement that eventually became
14 a thirty second spot in which the governor speaks at the
15 rally.

16 All right. Do you know that one; where he is
17 dressed in the typical Puerto Rican shirt, with the--

18 A Guayabera.

19 Q You have the name. I don't--

20 A Yes.

21 Q And he is exorting the crowd.

22 Do you remember that advertisement?

23 A I remember that.

24 Q He says that the cost of that advertisement
25

1
2 would have pulled the expenses up to around sixty-three
3 thousand dollars from the thirty-seven thousand dollar
4 figure.

5 He says that--he testifies that there was a
6 meeting held in which he proposed this advertisement and
7 it was approved by Terry O'Connell or Evan Dovelie or both.

8 Were you present at such a meeting?

9 A Well, I could have been present.

10 Q Were you present?

11 Do you remember the discussion that centers
12 around a new advertisement?

13 A I am talking from memory.

14 Q Go ahead.

15 A I could have been present, and I--if I were
16 not present, I know about the conversation because Joe
17 Franco told me about the need of that, and because I was
18 present and I am sure of that being Pedro Rivera Casiano
19 in Joe Franco's agency in relation--Joe Franco told about
20 the need of a good t.v. spot and I think that is part of the
21 one take in Juncos where the governor is shaking hands,
22 and then he appears on a platform addressing the rally.

23 Because I coincided in the different occasions
24 where even Pedro Rivera Casiano or Virgilio Ramos or Evan
25 Dovelie or even Terry O'Connell may have been in that

1
2 office because the La Fortaleza--

3 Q What does that mean?

4 A La Fortaleza is the governor's mansion
5 and office.

6 Q I didn't know that.

7 A Yes. Send Virgilio and Pedro Rivera
8 Casiano to work with, as liaison with Joe Franco for the
9 production of this t.v. spot and to make a more aggressive
10 t.v. campaign, especially.

11 And, of course, these services were for sure
12 approved by Evan Dovelie, because he was the one that
13 ordered--

14 Q Do you remember him approving those at
15 this meeting?

16 A Well, to the best of my recollection, yes.

17 Q Okay.

18 A Because I know that he ordered all those
19 services.

20 Q Especially this one, which was so crucial,
21 as it has been testified?

22 A Yes, it was crucial.

23 Q If Joe Franco wouldn't have received the
24 approval, he wouldn't have put that spot?

25 A Somebody else approved it.

1
2 And somebody who has the responsibility of
3 approving with backing of the financial part of the Carter-
4 Mondale.

5 Q Another series of questions, and we'll take
6 a break and kind of stretch our feet a bit.

7 A Don't worry.

8 Q It's been three hours.

9 A Well, take your time. It's a pleasure to
10 be here.

11 Q Let me ask you this line of questions.

12 Did you see any of the Amigos Committee--Amigos
13 advertising before they appeared in the newspapers?

14 A Yes, I think so.

15 Q Were these newspaper ads identical or
16 similar to the ones put together for the Carter-Mondale
17 Committee?

18 A I don't think so.

19 That is, when he has something he called me, or
20 I went to his office and he showed me. Because I wanted
21 always to have one thing separated from the other. Not to
22 mix it.

23 But I have--I didn't supervise the strategy nor
24 the campaign, nor the media services of the Amigos de
25 Jimmy Carter.

1
2 Q I think you already testified that you
3 saw Comite Amigos t.v. ads.

4 A Yes.

5 (Off the record interruption.)

6 MR. WHITEHEAD: Mr. Viera Martinez, as you
7 know, an emergency situation has arisen involving
8 the death of my father-in-law.

9 At this time, I would like to suspend this
10 deposition, not close the deposition, in effect,
11 maintain the subpoena open.

12 If that's all right with you, I will at this
13 point suspend the deposition.

14 THE DEPONENT: Mr. Whitehead, initially I
15 suggested you that, because I understand your
16 problem is a family problem and that's the right
17 thing, and I agreed that this deposition be
18 suspended and I am at your disposition whenever
19 you want.

20 MR. WHITEHEAD: I thank you.

21 THE DEPONENT: You call me.

22 MR. WHITEHEAD: I thank you very much, Mr.
23 Viera Martinez.
24
25

1
2 THE DEPONENT: We can continue the
3 deposition, and if I can be of any help, I
4 am here.

5 MR. WHITEHEAD: I certainly appreciate
6 it. I really do.

7 ***

8 (At which time the deposition
9 was suspended.)
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REPORTER'S CERTIFICATION

I, ARTHUR G. PINEDA, Official Court Reporter
in the United States District Court for the District of
Puerto Rico, and Registered Professional Reporter with
the National Shorthand Reporters Association:

DO HEREBY CERTIFY: That the foregoing transcript
is a full, true and correct record of the proceedings, which
was taken down by machine shorthand by me and thereafter
was reduced to typewriting under my direction.

I FURTHER CERTIFY: That I am in no way interested
in the outcome of the cause named in said caption.

Arthur G. Pineda

NOTARY PUBLIC'S CERTIFICATION

I, JUAN OSVALDO RODRIGUEZ LOPEZ, ESQ., duly
commissioned and qualified in and for the Commonwealth of
Puerto Rico

DO HEREBY CERTIFY: That the deponent and the
reporter in charge of the taking of the record were duly
sworn by me before the commencement of the taking of the
proceedings:

That the foregoing is the official transcript
of the record prepared by the reporter:

That I am acting as notary public by stipulation
of counsel for the respective parties herein.

IN WITNESS WHEREOF: I sign these presents
and affix my notarial seal in San Juan, Puerto Rico, this
_____ day of _____, 1982.

Notary Public

BEFORE THE FEDERAL ELECTION COMMISSION

In The Matter Of:

Comite Amigos De Jimmy Carter

MUR 1354

Depositions of:

JOSE E. FRANCO

and

IRMA GOMEZ

The depositions of Jose E. Franco and Irma Gomez were held before Olivia D. Gittens, Court Reporter, on the 26th day of October, 1982, at the Office of the United States Attorney, Federal Office Building, Hato Rey, Puerto Rico.

APPEARANCES

THOMAS J. WHITEHEAD, ESQ.
SUSAN CALLAHAN

Representing The Federal Election Commission.

LUIS RODRIGUEZ-BIGAS, ESQ.
Apt. 5072
Oficina Postal General, Puerto Rico

Representing Jose E. Franco and Irma Gomez.

JUAN OSVALDO RODRIGUEZ LOPEZ, ESQ.
Notary Public

(Court reporter and deponents
duly sworn.)

MR. WHITEHEAD: Let the record reflect that
we are going to be taking the testimony of two
individuals during this deposition, and I will
direct questions to each of the individuals at
the proper time.

Whereupon:

J O S E F R A N C O and I R M A G O M E Z,

having been first duly sworn, were examined orally upon
their oaths and testified as follows:

DIRECT EXAMINATION

BY MR. WHITEHEAD:

Q Now, would you state your name and address
for the record, Mr. Franco.

A My name is Jose E. Franco. My address, my
home address is 1319 Ashford Avenue, Santurce, Puerto Rico,
00907.

Q And your business address?

A My business address is at Joe Franco &
Associates, Incorporated, 1120 Ashford Avenue, Santurce,

1
2 Puerto Rico, 00907.

3 Q Could you give us your telephone number
4 at your business address for the record?

5 A My telephone number at my business address
6 is 721-8445.

7 Q And your home telephone number?

8 A 728-2824.

9 Q And would you state your name and address
10 for the record, please?

11 A My name is Irma M. Gomez, and my home
12 address is 272 Canal Street in Santurce, Puerto Rico.

13 My home phone number is 724-6085.

14 Q And your business address is...?

15 A My business address is 1120 Ashford Avenue,
16 Santurce, Puerto Rico.

17 Q And are you the Joe Franco of Joe Franco &
18 Associates?

19 A Yes, sir.

20 Q Miss Gomez, are you employed by Joe Franco &
21 Associates?

22 A Yes, sir.

23 Q Mr. Joe Franco, what is your position with
24 Joe Franco & Associates?

25 A I am the president of the organization

1 and the creative director.

2
3 Q Miss Gomez, what is your position with
4 Joe Franco & Associates?

5 A I am vice-president and general manager?

6 Q How long has Joe Franco & Associates
7 been in existence?

8 A Since November, 1964.

9 Q Is it a corporation?

10 A It is a corporation.

11 Q A Puerto Rican corporation?

12 A A Puerto Rican corporation.

13 Q And is it closely held? That is, that you
14 have just--you are the shareholder?

15 How many shareholders do you have?

16 A It's a closed corporation in the way that
17 all the shareholders are members of the organization.

18 Q Right. So,--

19 A I have the majority of the stock.

20 Q Miss Gomez, do you have some ownership in
21 the corporation?

22 A Yes, I do.

23 Q Was one other individual connected with the
24 organization that has stock ownership?

25 A Not connected?

1
2 Q No, connected with.

3 A Oh, yes.

4 Q Who is he?

5 A Mr. Frederick Williams Schuck.

6 MR. RODRIGUEZ: Can I interrupt?

7 I think that the question--he didn't understand
8 that question.

9 MR. WHITEHEAD: He did not?

10 MR. RODRIGUEZ: No. Could you ask it again?

11 MR. WHITEHEAD: I will ask it again.

12 BY MR. WHITEHEAD: (resuming)

13 Q Who are the other shareholders in Joe Franco &
14 Associates?

15 A Oh, well, besides Mr. Schuck are Mr. Luis
16 Pena, Minerva Molina, Cynthia Franco and Francisco Arias
17 and Elba Ortiz.

18 Q Who are the other officers of Joe Franco &
19 Associates?

20 A The other officers: Mr. Schuck, Frederick
21 Williams Schuck is the executive vice-president; and Mr.
22 Francisco Arias is the treasurer.

23 Q Okay. What is the nature of Joe Franco &
24 Associates' business?

25 A It's an organization devoted to advertising,

1
2 public relations and marketing.

3 Q Do you do both political and non-political
4 advertising?

5 A Yes, sir. We do non-political advertising.

6 As a normal or regular advertising agency we
7 advertise goods and services, and at the same time we have
8 been involved in political advertising since 1968.

9 Q Could you tell me, for the record, what your
10 involvement was in 1968, in political advertising?

11 A In 1968, we did the advertising for a
12 candidate for mayor of San Juan; Mr. Carlos Romero Barcelo,
13 who happens to be the governor of Puerto Rico today.

14 Q And what services did you perform for him
15 during that election?

16 A I practically ran many--money parts involving
17 the campaign. Like we helped him in fund raising. We helped
18 him in--we acted more or less as a counselor in campaign
19 managing for the campaign money, and at the same time we
20 did the public relations and the advertisements for his
21 campaign.

22 Q What political advertising did you do?

23 A We do from designing and printing a bumper
24 sticker to creating a t.v. spot and placing the t.v. message
25 and putting this t.v. message on the air on several t.v.

1
2 stations.

3 Q Do you recall how it is that he came to you
4 and sought your services for the advertising?

5 A I recall that he came to see me through a
6 friend that I used to have--I have a friend that studied with
7 me in Miami University in Coral Gables. And Mr. Romero
8 Barcelo was looking for an agency and this friend referred
9 me to him.

10 Q And was he successful in his race?

11 A He won by fifty-nine per cent of the votes.

12 Q Were you involved in any political advertising
13 in 1970? Was there a campaign in 1970?

14 A No, no campaign in 1970.

15 Q Let me ask you this: Who are some of the
16 other political advertising agencies that are competitors
17 of yours?

18 A I'd say that the one who has been more active
19 in political advertising has been an organization known
20 as Badillo Compton. Badillo Compton is a merge from a
21 stateside agency called Compton Advertising and a local
22 advertising agency called Publicidades Badillo.

23 They merged and they formed this advertising
24 agency.

25 Q Are they a subsidiary of any particular

1
2 organization?

3 A No, they are not subsidiaries. The only
4 thing is that in the last election they handled the
5 advertising campaign for two different candidates with a
6 corporate--a corporate within the corporation and separate
7 from the organization.

8 Q I don't think I understand your answer.

9 A Let me explain it.

10 In the last--for example, in one primary and in
11 one election, general election in Puerto Rico, instead of
12 handling the advertising through the name of Badillo
13 Compton, they created another organization within the
14 organization.

15 Q Called?

16 A Corporate Advertising; and this was the branch
17 that handled the advertising.

18 Q Okay. Did you do any--are there any other
19 competitors aside from Badillo Compton?

20 A Oh, yes. I mentioned Badillo Compton. This
21 is the larger one, I would say. But Young and Rubican
22 have been participating in political advertising.

23 West Indies Advertising Company and several others,
24 but they have been involved in minor campaigns.

25 Q Was there an election in 1972?

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A Yes, there was an election in 1972.

Q Did you have any candidate's business--
advertising business during that election?

A I participated--I shared that campaign with
another advertising agency in the election of Mayor Romero
Barcelo in 1972..

Plus, I got involved in political advertising for
several major candidates for senators in Puerto Rico.

Q During that 1972 election?

A 1972 election.

Q All right.

Is it not a fact that there was no presidential
election--that is, president of the United States election,
primary elections in 1972 in Puerto Rico?

A No, sir, there was none.

Q Right. Okay.

Coming up to the 1976 election, did you have any
political candidates?

A Again, I worked with Mr. Romero Barcelo in
his campaign. This time he was seeking the governorship
of Puerto Rico, and again, I--our participation was shared
with another advertising agency.

Q Who was that?

A This time the agency was--let me recall it.

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MS. GOMEZ: Caribbean Advertising.

THE DEPONENT: Caribbean Advertising.

BY MR. WHITEHEAD: (resuming)

Q All right.

And in 1972 who shared the advertising with you in his mayoralty campaign?

A For mayor of San Juan, at that time it was Young and Rubican.

Q Now, is it not a fact that in 1976 there was no presidential election held in Puerto Rico, primary elections?

A No, sir, but caucuses were celebrated for the Democratic Party only. The Democratic Party celebrated caucuses in Puerto Rico, but one of the caucuses looks like a primary because the participation was people voting like in an election. It was open voting. It was not like voting in an assembly, you know.

Q Right. Is that to say that they voted within the neighborhood?

A Yes, they voted in schools.

Q Right.

A And so there was no restriction, like you had to be a delegate or something like that.

1
2 So, advertising was put on the air or newspapers
3 and radio; t.v., asking people to come and vote.

4 And in that case we were promoting that they vote
5 for the--in the caucus for the representation of Jimmy Carter.

6 In those days he was running for president of the
7 United States for the first time.

8 Q Did anybody else--was there any other names
9 in that caucus? Was there any other presidential name in
10 that 1976 caucus?

11 A Yes, the other candidate that received more
12 votes was Senator Jackson from the State of Washington, that
13 was placed.

14 Q Henry Jackson?

15 A Henry Jackson, yes.

16 Q And who did his advertising?

17 A For Henry Jackson, Badillo Compton.

18 Q And there were no other Democratic names in
19 the caucus?

20 A No. There was a section that run--what they
21 call, when nobody is affiliated to a candidate.

22 MS. GOMEZ: Independent.

23 THE DEPONENT: No, no, there is a name.

24 So, there were three different votes. One for Mr.
25 Carter, one for Henry Jackson and one that is

unattached, a group that was not attached.

BY MR. WHITEHEAD: (resuming)

Q All right.

Now, coming up to the 1980 primary election in Puerto Rico.

A 1980.

Q Right. Was there any Republican primary held?

A Yes, sir.

Q And who--excuse me.

A Go ahead.

Q And who were the candidates that were on the ballot in the 1980 Republican primary?

A In the Republican primary, if I can recall correctly, there was Mr. George Bush, Howard Baker, Robert Dole, Connolly--I forget his name.

Q John?

A John Connolly, and a Texan by the name of Fernandez. I forget his first name.

Q All right.

And did you handle any of the advertising for one of these individuals?

A We did the advertising for George Bush.

Q Do you recall who did the advertising for

1 Howard Baker?

2 A Howard Baker was done by Marti, Flores &
3 Prieto.
4

5 Q And John Connolly's advertising?

6 A I cannot remember.

7 Q Okay. And Senator Robert Dole's advertising?

8 A I cannot recall that, either.

9 Q What were the results of that primary election?

10 A That primary, Mr. Bush won by sixty per cent
11 of the votes.

12 Q That is, he obtained sixty per cent of the
13 overall votes?

14 A That's right.

15 Q When was that primary election held?

16 A February 17th. Sunday, February 17th.

17 Q 1980?

18 A 1980.

19 Q What services did you render for Mr. Bush
20 during that campaign?

21 A We helped Mr. Bush in creating a committee
22 in Puerto Rico, and that committee was held by Mrs.--

23 MS. GOMEZ: Julia Rivera de Vicente.

24 THE DEPONENT: Julia Rivera de Vicente, who
25 happens to be today in charge of--

1
2 MS. GOMEZ: Farmers Home Administration.

3 THE DEPONENT: Farmers Home Administration.

4 She is in charge of it.

5 BY MR. WHITEHEAD: (resuming)

6 Q Currently.

7 A Currently. Before that, before holding that
8 position, she was director of--

9 MS. GOMEZ: State Insurance Fund.

10 THE DEPONENT: Of the State Insurance Fund.

11
12 BY MR. WHITEHEAD: (resuming)

13 Q Go ahead. I am sorry.

14 A And we helped Mr. Bush in his committee, you
15 know, helping this lady that was the chairlady of this
16 organization.

17 And from there we created all the advertising for
18 Mr. Bush's campaign from bumper stickers up to the t.v. spots.

19 Q Does that include newspaper advertising, also?

20 A I'll tell you, we don't--didn't do any
21 newspaper advertising for Mr. Bush. We relied solely on
22 posters, bumper stickers and the electronic media; television
23 and radio.

24 Q And who approached you in connection with
25 Mr. Bush's campaign?

1
2 A I was approached from--by an attorney in
3 Washington, last name was Guinot, Luis Guinot.

4 Q Can you spell that?

5 A He was a Puerto Rican living in Washington:
6 G-U-I-N-O-T.

7 Q Did Guinot approach the woman who eventually
8 headed up the Bush committee?

9 A No, this woman was approached by Mr. Bush,
10 himself, because she happens to be Mr. Bush's assistant
11 in Puerto Rican affairs at the United Nations when Mr. Bush
12 was Ambassador at the United Nations.

13 Q So, it is your testimony that she was the
14 head of the committee? You just helped her with the
15 advertising?

16 A That's right.

17 The only thing that I helped her also in was in
18 setting up the committee.

19 Q Generally helping her with the papers and
20 stuff?

21 A Correct.

22 Q Was there a Democratic presidential primary
23 held in 1980?

24 A Yes, March 16th, 1980.

25 Q Was that a Sunday, also?

1 A Another Sunday, yes.

2 Q All right.

3 And did you have any client in that particular
4 election?

5 A Yes, sir. I had the Carter-Mondale Committee,
6 Mr. Carter's candidacy; running for president.

7 Q And who were the other candidates involved in
8 the presidential--

9 A In that particular election there was only
10 one other candidate; that was Mr. Ted Kennedy.

11 Q Senator Ted Kennedy?

12 A Senator Ted Kennedy.

13 Q Who handled his advertising?

14 A Mr. Kennedy?

15 Q Yes.

16 A A local operation--a local agency that
17 operates by the name of Lopito, Ileana & Howie. That's the
18 names of the three principals.

19 Q Could you tell us what the--let me ask this:

20 How did you become familiar with the Carter-Mondale
21 Presidential Committee? What were the circumstances
22 surrounding that?

23 A What happens is that I was involved with the
24 Democratic Party movement in Puerto Rico since 1976, because
25

1
2 in those days a fellow by the name of Franklin Delano
3 Lopez was in charge of our public relations department
4 at our agency.

5 And in 1976, when they were looking for a candidate
6 to go to the primary with the Democratic Party, the sector
7 that was in the--in charge of the Democratic Party, they
8 were looking for a fellow, and so they wrote the different
9 candidates that were running in the primary for the Democratic
10 Party, and the only guy that answered back was Mr. Jimmy
11 Carter.

12 So, this fellow started working with the Carter
13 campaign in my office, until he got very much involved with
14 the thing and he resigned to devote all his time to promoting
15 the candidacy of Mr. Carter in the Puerto Rican primary.

16 And since we had a good relationship, Mr. Franklin
17 Delano Lopez and myself, I handled the advertising, the
18 promotions that were done after that initial effort by Mr.
19 Lopez.

20 Q Are you talking about 1980?

21 A No, I am talking about 1976.

22 Q But I mean afterwards, 1980.

23 A Well, remember that in 1976 we have the
24 caucuses that I told you.

25 Q Right.

1
2 A And in those caucuses they spend money in
3 advertising. They spend money through us. And Mr. Carter
4 won in those caucuses.

5 Q Right. So, in 1980 who approached you to
6 handle the business of the Carter-Mondale Presidential
7 Committee?

8 A Then in early 1980 Mr. Angel Viera Martinez,
9 who in those days was the Speaker of the House, the House
10 of Representatives of Puerto Rico--we have been acquainted
11 for many years, because I have been doing some advertising
12 for--whenever he ran for office.

13 He advised me that he was appointed chairman, or
14 coordinator for the Carter-Mondale Presidential campaign
15 in Puerto Rico. That was early 1980.

16 Q Approximately, what time was this? January?
17 February?

18 A I'll say that was late January or early
19 February.

20 Q All right.

21 Do you recall what Mr. Martinez or Mr. Viera
22 Martinez told you about the Carter-Mondale Presidential
23 campaign in, let's say, in early February?

24 A Well, in those days he--in that meeting that
25 I had met with him he had advised me--he told me that he would

1
2 like to have from me a sort of presentation about how much
3 money was needed for a successful campaign.

4 So, I told him that he needed at least about a
5 quarter of a million dollars; two hundred fifty thousand
6 dollars. And he told me, okay, well, prepare for me a plan.

7 At the same time I advised him that I was involved
8 in the George Bush campaign. He mentioned to me that that
9 might be a problem, but to go ahead and make the presentation,
10 the two hundred and fifty thousand dollars media plan, with
11 the ideas and so forth.

12 I didn't hear from Mr. Viera Martinez until the
13 12th or the 13th of February. I was still involved with the
14 George Bush campaign, and I remember that I was called by
15 Mr. Viera Martinez to a meeting in his office at the Capital
16 Building, in the Speaker's Office, and there, there was
17 a meeting that there were several people there.

18 Q Who was there present at the meeting?

19 A At that meeting--you have to forgive me, but
20 I have to recall names.

21 Q By all means.

22 A I remember local people. For example, Mr.
23 Angel Viera Martinez was there. Mr. Virgilio Ramos, that this
24 was an assistant to the governor of Puerto Rico.

25 Mr. Carlos Romero Barcelo was there.

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Q Virgilio Ramos?

A Attorney Virgilio Ramos.

Q Go ahead. The next name?

A Efren Santiago. In those days he was an assistant to the Speaker of the House, Mr. Viera Martinez, and an active member of the Democratic Party in Puerto Rico.

Then representing the Carter-Mondale Presidential Committee, I recall a guy by the name of Terry O'Connell, a fellow by the name of Buddy James. And then there was a lawyer there that was the one that was doing most of the talking, and I cannot recall the name of this guy.

It was another lawyer, another fellow there.

Q There was another lawyer?

A Yes.

Q Do you remember his name?

A No, I cannot remember.

Q We are talking about two or just one?

A No, lawyers, there was Angel Viera Martinez and Virgilio Ramos, but I don't know if Mr. Buddy James is a lawyer or not, but there was another fellow there.

You have to keep in mind that, you know, I was introduced to all these people, and there were about a dozen there. And when you shake hands very fast it's very hard to recall names.

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1
2 Now, after that meeting I met several people, that
3 I don't know if they were at that meeting or not. I'm not
4 too sure.

5 Q All right.

6 Who else besides yourself was there from Joe
7 Franco & Associates?

8 A I was the only one.

9 Q All right.

10 Could you then tell us what happened at that
11 meeting with all of those individuals?

12 A Well, in that meeting they--first of all they
13 told me that they had decided to give my organization the
14 account, the advertising account, even though they knew that
15 I was very much involved with the Republican primary.

16 But since I was doing a very successful job for
17 Mr. Bush's campaign, and they knew that I could handle for
18 them a very successful campaign, too.

19 So, after that, they made that decision, this fellow
20 that I mentioned to you that I could not recall his name,
21 he was the one who gave the instructions.

22 He said, first of all, that there was a problem.

23 Q What was the presentation that you made to
24 them? Was that the two hundred fifty thousand dollar
25 presentation that you testified to earlier?

1
2 A Yes, sir; two hundred fifty thousand.

3 Q All right.

4 A So, the fellow mentioned right at the
5 beginning that there were some problems; some limitation
6 of expenditures from Carter-Mondale funds from the United
7 States and Puerto Rico that at that stage he only had about
8 twenty thousand dollars available legally in Puerto Rico;
9 that they had to be doing another--they have to develop a
10 plan, and the plan was that they had to create a local
11 organization completely separate from the Carter-Mondale
12 Committee that could raise money and spend that money on
13 behalf of Jimmy Carter, Friends of Jimmy Carter.

14 Finally, the committee was called Comite Amigos
15 de Jimmy Carter.

16 Q This was the lawyer?

17 A The lawyer, yes.

18 Q Who mentioned this? Whose name you can't
19 recall?

20 A Right.

21 Q All right.

22 Was he out of the United States?

23 A Yes.

24 Q He was out of the United States?

25 A He was a prominate member of the Carter

1
2 Presidential Committee in the states and he sounded like
3 he was a very knowledgeable fellow concerning to the
4 Federal Electoral Commission, because he was very straight
5 about the things he mentioned.

6 Q When the determination was made that there
7 was a separate committee needed, what happened at that
8 point?

9 A Well, when it was agreed there was a necessity
10 to create a new committee to--in order to have--to meet with
11 the requirement of a quarter of a million dollars campaign,
12 Mr. Viera Martinez took over and he started--you know,
13 discussing with the other people in the room how to create
14 the committee; if it was a committee that had to be
15 registered, if it had to be a corporation, you know.

16 And then they started naming names, you know,
17 who could be the president, who could be the treasurer,
18 and then they called one guy over the phone, and this guy
19 was appointed president. And it seemed to me that he
20 accepted while talking.

21 Q Who was that?

22 A His name--

23 MS. GOMEZ: Manuel Perez.

24 THE DEPONENT: Manuel Perez Rodriguez.
25

1
2 BYMR. WHITEHEAD: (resuming)

3 Q How do you know that it was Manuel Perez
4 Rodriguez? How do you know that it was him that was called?

5 A Because after Mr. Viera Martinez spoke to
6 him, he gave to me the phone in order that Mr. Rodriguez
7 can come to my office and, you know...

8 Q So, then, you discussed coming to your office
9 with Mr. Rodriguez on the phone that night?

10 A No, I was introduced to Mr. Rodriguez by
11 phone.

12 Q At that meeting?

13 A At that meeting.

14 Q All right.

15 Mr. Viera Martinez handed you the phone and said,
16 "Here, speak to Mr. Rodriguez?"

17 A Yes. And then I make--because the thing
18 was that he had to come to my office so that I could see
19 him and we would get together and work out the possibilities
20 that this committee had to have with my organization about,
21 particularly, the budget and everything.

22 Q What date did you schedule for a meeting with
23 Mr. Rodriguez? Do you recall?

24 A It was--I'd say two or three days right after
25 that meeting. I cannot recall dates.

1
2 Q And it was Mr. Viera Martinez that made
3 the phone connection; he called Mr. Rodriguez?

4 A Yes, he called him at home. It was about
5 eight o'clock at night. The meeting started about four
6 o'clock and lasted until about ten o'clock.

7 So, he called around eight o'clock. And then he
8 called another guy, Adalberto Jurado, and Mr. Jurado was--
9 this fellow came to the office. It seemed to me that he
10 lived close to the Capital Building, because he showed up
11 about half an hour or forty-five minutes later.

12 Q So, Mr. Adalberto Jurado showed up at the
13 meeting held in the Speaker's Office that night?

14 A Right.

15 Q All right.

16 And what was said to Mr. Jurado when he arrived?

17 Who told him what was said?

18 A Mr. Viera Martinez told him that there was
19 a need to create a new organization to raise funds and to
20 put advertisements on behalf of Jimmy Carter, because there
21 was a limitation from Carter-Mondale.

22 And they told him and he accepted. You know, he
23 was surprised but he accepted, because Mr. Jurado, I
24 discovered, was a very close friend to Mr. Efren Santiago.

25 Q Mr. who?

1
2 A To Mr. Efren Santiago. Very, very close
3 friends.

4 Q Who was at the meeting, Senator Santiago?

5 A Who is a senator now. And he was the one
6 who referred his name to Mr. Viera Martinez.

7 Q At that meeting?

8 A At that meeting.

9 They were looking for a guy that was honest, you
10 know, a guy who could rely on him so that...

11 Q Okay. What was further discussed at that
12 meeting after Mr. Jurado was told about the two committees:
13 the Carter-Mondale Presidential Committee and the Komite de
14 Amigos?

15 A Well, they give me some instructions about
16 the billing.

17 He told me that we have to keep separate books,
18 separate billings; that I could not mix up the Carter-Mondale
19 with the Komite de Amigos, and they cannot use Carter-Mondale
20 money to pay for Komite de Amigos in other words.

21 Q Who was telling you this, now?

22 A The lawyer. The lawyer. The guy who seemed
23 to have an expertise in things related to the Federal
24 Election Commission and the regulations.

25 Q Did Mr. Evans Dovelie take any part in that

1
2 discussion?

3 A I can't remember if he was there or not.

4 But then, after--when the campaign started, I'll
5 say--

6 Q Let's finish with the meeting. I want to
7 know, you know--did Mr. James take any part in the
8 conversation at that meeting?

9 A No, he was there. He probably said one
10 thing or the other, but was not too important, what he said.

11 Q Mr. O'Connell?

12 A He spoke once in a while.

13 Q But is it your testimony--go ahead.

14 A Mr. O'Connell, you know, sometimes he added,
15 you know, if the lawyer told me something he would come
16 over and say, "Listen, you have to be careful with this,
17 careful with this other thing. The billing, don't mention
18 that we were here."

19 Things like that.

20 Q He, O'Connell, specifically said to you,
21 "Don't mention that we were here?"

22 A Well, in a way, that they were not supposed
23 to be giving orders to the Comité de Amigos.

24 Q Was that because of anything he said or was
25 that your impression?

1
2 A Well, according with the instructions that
3 I was receiving from the lawyer, it looked like the Komite
4 de Amigos had to operate completely separate from Carter-
5 Mondale.

6 He told me, "You be very careful. You have to--"
7 you know. And when I said that, like don't tell that we
8 were here, it means that I could not say that they were
9 giving the instructions to the Komite de Amigos.

10 Q That was your impression?

11 A Yes, that was the impression that I received.

12 Q I just want to make sure that this is
13 either something he said to you, that is, Mr. O'Connell, or
14 did not say to you, that's all.

15 A Well, he said it, but he don't--it was not
16 the total intention to do it. Let's put it that way.

17 Q Now, after that meeting then, was the Bush
18 campaign, the primary election then took the next sequence,
19 right?

20 A Yes. That meeting occurred in the days before
21 the Sunday that Mr. Bush won the primary.

22 Q Now, after the primary was over, what happened
23 in connection with--

24 A The very next day we had a meeting in my
25 office.

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Q We are talking about February 17th?

A The 18th, in the afternoon.

Q The 18th.

A Mr. Viera Martinez was in my office and we started, you know, working, because there was a problem there, you know, the Carter-Mondale--the Comite Amigos was getting--they don't have any money.

Q Who was in the office on the 18th?
You mentioned Viera Martinez. Who else?

A Viera Martinez alone.

Q Just you and Mr. Martinez?

A Yes, that's right.

Q Was anybody else connected with Joe Franco & Associates there?

A Oh, yes, there was. Part of my staff was there; my production manager.

Q What is his name?

A Luis Pena.

Q He is the one mentioned earlier in the testimony?

A Yes, that's right. Maybe several other people were there, you know, the regular staff that gets involved in productions.

Q Okay. Tell us what happened at that meeting

1
2 on the 18th with Mr. Viera Martinez.

3 A Well, in that meeting we decided that our
4 first priority was to come up with some activity to raise
5 money, and the decision was to run a radio marathon.

6 That is a sort of activity that in Puerto Rico
7 works. And the day for that radio marathon was set up for
8 the very next Saturday; that was the 23rd. Yes, the 23rd, if
9 I am not wrong.

10 So, as you can see, we had to work real fast. We
11 had to run, in order to have the advertising prepared and
12 had about three days campaign. So, everybody helped in the
13 fund raising.

14 So, that was the primary idea, to run this
15 fund raising, to raise the money.

16 Q What did you do? What did Joe Franco &
17 Associates organization do at that point?

18 A So, we right away, we started contacting
19 the t.v.--the radio stations that were to be involved in
20 the transmission.

21 We decided the promotion, radio spot promotion.
22 We summoned newspaper ad promotion for that, and also we
23 did some--we recorded cassettes and cartridges to play in
24 sound trucks that went around the island promoting this
25 thing. That was my primary--what we did for that fund

1
2 raising.

3 There was not much money involved, because, you
4 now, we were looking for money, not spending.

5 Q And who was the principal committee involved
6 in that? Was it the Carter-Mondale Presidential Committee
7 or the Comite Amigos?

8 A It was for the Comite Amigos.

9 Q Mr. Viera Martinez was the one who told you--

10 A Yes.

11 Q --the money we have to raise for--

12 A The Comite Amigos.

13 Q --the Comite Amigos.

14 A Then, in that week, after several meetings,
15 Mr. Jurado got much involved in the whole thing.

16 Q Let's stop there.

17 Mr. Jurado was not present at that first meeting?

18 A At the first meeting. But he came to the
19 second, third and fourth.

20 Q Did you have a meeting every day that week?

21 A Oh, yes. We were very much involved, because
22 we had to produce tin cans with labels so people can drop
23 the coins there.

24 We had to prepare envelopes so people could stuff
25 the dollars. So, all those things were coordinated by Mr.

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1
2 Jurado, not by Mr. Viera Martinez.

3 Q Say that last part again?

4 A Those things were coordinated by Mr. Jurado;
5 not by Mr. Viera Martinez.

6 Q Was Mr.--

7 A In other words, Mr. Viera Martinez was the
8 small details of the project, see?

9 Q But was Mr. Viera Martinez present?

10 A Oh, he was present in several meetings. But
11 I am talking to those particular details like what is going
12 to be the size of the envelopes. I have to look for the
13 tin cans. You know, that was Mr. Jurado's job.

14 Q Were any of the other individuals connected
15 with the Carter-Mondale Presidential Committee present at
16 these meetings during that week of February 18th, 1980?

17 A The one at the Speaker's House?

18 Q No, no. This is--

19 A Well, I am talking about the next day after
20 the Bush--no, no.

21 The Carter-Mondale people started coming to my
22 office, I'll say on the--right after the fund raising
23 activity, the week after the fund raising activity.

24 Q So, is it your testimony that during the
25 week of February 18th, 1980, through Saturday the 23rd,

1
2 that Viera Martinez and Jurado--

3 A Yes.

4 Q --were working with Joe Franco & Associates--

5 A Right.

6 Q --on this fund raising?

7 A Right.

8 Q All right.

9 The fund raising was held on the Sunday or
10 the Saturday?

11 A On Saturday, the 23rd.

12 Q Okay. Now, the following week what happened
13 as far as the campaign was concerned?

14 A The following week was the week that we
15 started in the production of the t.v. spots and for the
16 campaign.

17 Then in those days I started seeing Mr. Evans
18 Dovellet, and this fellow Buddy James, and other members
19 that once in a while, because then the--that Saturday we--

20 Q How about Terry O'Connell?

21 A Terry O'Connell, yes. Terry O'Connell was,
22 I'll say like the coordinator from this stage, you know.
23 He was the one that looked at everything, was doing the--
24 that everything was done the right way.

25 Q Was Viera Martinez present at this--at these

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meetings?

A Yes.

Q Was Mr. Adalberto Jurado?

A Yes.

What happened was that Mr. Viera Martinez has a place in Munoz Rivera Avenue that was a huge old building that was empty in those days, and he rented this space for a headquarters for his own campaign, you know, for his campaign for elections as representative.

And he gave some part of the old building to the Comite Amigos and to Carter-Mondale.

Q So, is it then your testimony that in that building--what is the name of the avenue again?

A Munoz Rivera Avenue.

Q Munoz Rivera Avenue.

A Um-hum.

Q There was housed the Carter-Mondale Presidential Committee activities?

A Right.

Q And Viera Martinez's activities for his re-election to the House of Representatives of Puerto Rico?

A Right.

Q And the Comite Amigos de Jimmy Carter?

A Right. And everybody was paying a share of

1
2 the rent. Carter-Mondale was paying a thousand dollars a
3 month. That is what I learned.

4 And the Comite Amigos, I believe, was probably
5 paying something there.

6 Q How did you learn that?

7 A You know, talking to Mr. Viera Martinez.

8 Q All right.

9 A And there, in this place was that I met these
10 gentlemen, you know, very frequently.

11 Every time I walked in there it was Evans Dovel
12 there, Terry O'Connell or Buddy James.

13 Q Is the name Bob Keefe familiar to you?

14 A Yes, that's another guy that was present in
15 one or two meetings. I met him a couple of times.

16 But most of Mr. Keefe's talking was with Mr. Viera
17 Martinez. He never gave me instructions to do anything.

18 Q Were you introduced to him? You shook his
19 hand; Mr. Keefe?

20 A Yes. Oh, yes.

21 Q How was he introduced to you? What title
22 did he have, or did he have a title?

23 A Gee, I cannot remember.

24 The truth is that I was introduced by too many
25 people.

1
2 Q But you are familiar with the name Bob Keefe?

3 A Oh, yes.

4 Q Okay. You have named in affidavits previously
5 submitted in this particular matter, that Bob Keefe was
6 one of the individuals involved in negotiating the Carter-
7 Mondale contract.

8 That was your affidavit of July 24th. You stated
9 that he contacted you personally. That was your affidavit
10 of July 12th and May 5th.

11 You stated that you had spoken to him on the
12 phone. That was your affidavit of July 12th.

13 You stated that he visited the offices of Joe
14 Franco & Associates. That was your affidavit of July 12th.

15 Yet, Bob Keefe says that he was never in Puerto
16 Rico during the primary campaign or the primary period.
17 Is there any way that you can explain this?

18 A I might be confused--I might be confusing
19 this guy with another guy that was there, you know. Because
20 after one day talking with Mr. Viera Martinez I recall that
21 I mentioned to him about Bob Keefe and Mr. Viera Martinez
22 said that Keefe was in Puerto Rico.

23 Viera Martinez told me. But in that meeting there
24 were several people and then I was confused with the
25 names, you know.

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Q Now, is it--

A And probably when I am referring to Keefe, probably I am referring to the lawyer. Maybe I am thinking that--I thought that Keefe was the lawyer.

Q All right.

It is my understanding that Keefe is not a lawyer.

A Well, I am talking about the lawyer that gave all the instructions, that was the big spokesman.

Q I understand. You did state that Viera Martinez told you that Keefe was in Puerto Rico?

A Yes.

Q He did?

A He told me once.

Q He told you once?

A Yes. Because then I tried to, you know, I was talking, I said, "Gee, maybe I don't recognize this guy too well." Because I tried to--because the key person in that meeting, that meeting at Viera Martinez's office, the guy who gave me all the instructions, "Be careful about this billing here, and billing there," you know, it was this lawyer.

And I get the impression that this guy was Keefe. But then it happens that he was not Keefe.

Q So, now you are saying that it was not Keefe?

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2 It was the lawyer? That you could be confused
3 as to the name Keefe?

4 A That's right.

5 Q Okay. Can you recall what the lawyer looked
6 like?

7 A He was short. I'd put it like five-four. Kind
8 of--not too heavy, but you know, bulky.

9 Q A hundred and sixty, a hundred and seventy
10 pounds, thereabouts?

11 A And he looked like around fifty years old.

12 Q Color of hair?

13 A Don't remember.

14 Q Did he have a mustache?

15 A It's very hard to recall, because it was just
16 once, you know.

17 Q That one meeting?

18 A That one meeting. He came just to, you know, he
19 was the expert on how to create this committee, you know, to
20 help the Carter-Mondale people when they had limitations in
21 areas.

22 He seemed to be an expert in that.

23 Q At our meeting yesterday you said that you were
24 going to contact someone, probably Efren Santiago, to find
25 out if he remembered the name of the lawyer that was at that

1
2 meeting.

3 Did you contact Santiago?

4 A I tried several times but he was out of
5 San Juan. He was out of San Juan. I could not reach him.

6 I remember that some time ago I also--because since
7 I was aware that this person was a very important one, I
8 talked to Mr. Viera Martinez and he could not remember,
9 either, the name. He knows that this guy was there, but he
10 could not remember, either.

11 Q But is it your testimony that he was only
12 there at the one meeting?

13 A Oh, yes.

14 Q Just the one?

15 A Yes.

16 Q Which was held--

17 A After that meeting I never saw him again.

18 Q --in Viera Martinez's office?

19 A Right. And Mr. Viera Martinez remembered this
20 guy and we have even been trying to--maybe Viera Martinez
21 remembered.

22 Q When was the last time that you talked to
23 Mr. Viera Martinez?

24 A Mr. Viera Martinez?

25 Q Right.

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A I talk to him very often.

Q When was the last time you talked to Mr. Viera Martinez about the meeting or about this case, in fact?

A He called me yesterday, last night. He called me last night.

Q Can you tell us what was said during that conversation?

A No, I don't mention--I just said that I was subpoenaed for today. I don't say anything, because you told me not to.

So, I keep my word.

Q Okay. All right. That's fine.

Did he mention anything about--

A No. He--I told him that I was to tell the truth, I was frank. I said, listen, I want to tell the truth because this thing has been, you know, revolving and revolving, you know.

I mentioned to him that I was to tell that he was the one who was calling the shots. I told him that.

Q You told him that last night on the telephone?

A Yes, last night I did. I told him.

Q Okay.

MR. WHITEHEAD: Let's take a five minute break.

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(Short recess.)

MR. WHITEHEAD: Miss Reporter, would you please read back the last question and answer.

(The last question and answer read back by reporter.)

BY MR. WHITEHEAD: (resuming)

Q Before we took the break and went off the record, we were discussing meetings held during the week after the radio marathon, which would be the week of February 25th, or thereabouts.

Is that correct?

A Yes, correct.

Q Did you have a meeting on the Monday of that week? Do you recall?

A After the 23rd?

Q Yes.

A Well, probably, because--let me tell you, since we were very close to the primary date, I will tell you we had a meeting almost every day.

Q You also were handling some non-political client business at that time, too?

A Oh, yes. We were very much involved in other accounts.

1
2 Q Right.

3 Could you just tell me who the employees of
4 Joe Franco & Associates were that were working on the
5 Carter-Mondale account?

6 A Well, besides the fellow that I mentioned
7 several times, Luis Pena, there was Minerva Molina. She
8 was handling the media in these days, the media department.

9 And I had several other people, but I don't want
10 to commit myself giving names, because we have been having
11 a turnover, you know, of people.

12 Q All right.

13 Delano Lopez was still with you in 1980?

14 A No, sir.

15 Q So, that was not the same that you just
16 mentioned. I just wanted to be sure.

17 A No.

18 Q Were there separate people working on the
19 Comite Amigos account at that time?

20 A No, the same people were working on both
21 accounts.

22 Q They were handling both?

23 A Right.

24 Q One handling production, one handling media?

25 A The same media people and the same production

1
2 people were involved in both sides.

3 The only thing that we kept separately was the
4 billing. We tried to keep it separate.

5 Q We'll get to the billing in a bit.

6 Were you supplied any materials, such as proposed
7 advertisements, proposed bumper stickers? Did either Carter-
8 Mondale Committee or anyone with the Komite Amigos supply
9 you with anything for the advertising and media campaign?

10 A Carter-Mondale supplied some of the stuff
11 made in the states, some of the materials prepared in the
12 states like bumper stickers and like posters.

13 Some of our posters were used in certain areas.
14 For example, areas that we felt that people know enough
15 English to--so, the poster had some impact or result.

16 But in other cases we get the materials from them
17 and adapt it to Spanish, or, you know, keep certain elements
18 of the drawing, of the printing and added another in
19 Spanish.

20 Q Did they supply you anything in connection
21 with the Komite Amigos, material?

22 A No, they don't supply anything for Amigos.

23 Q Did you utilize any of the Carter-Mondale
24 bumper stickers, posters, for the Komite Amigos?
25

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2 A Well, you have to remember, or take into
3 consideration that in political campaigns we have to rely
4 mostly on volunteers, and in those days I could not detect
5 which volunteers were for Carter-Mondale, which volunteers
6 were working for Carter-Mondale.

7 They are working just for one purpose: to have
8 Mr. Carter win in the primary. So, if we have handled the
9 material of bumper stickers, we didn't know it.

10 Q Well, did you use--let me ask this question:

11 Did you use bumper stickers or posters for the
12 Comite Amigos, with the Comite Amigos name on it, at any
13 point?

14 A No.

15 Q No?

16 A No.

17 Q So, actually, the bumper stickers, posters,
18 are Carter-Mondale Presidential Committee materials?

19 A That's right.

20 Q Did the Comite Amigos do any bumper stickers?

21 A Yes, we did bumper stickers with Amigos.

22 Q With the Comite Amigos' name on it?

23 A I cannot remember.

24 Let me tell you what happened. Here, it's like--not
25 like in the states. In the states you are required to put

1
2 the union label and you have to put, sometimes, the
3 candidate, the committee.

4 Here in Puerto Rico you are not required, and
5 since we are dealing with a very small space, we tried to
6 use the space for the message; not to get other foreign
7 messages there.

8 Q So, is it your testimony, then, in bumper
9 stickers or posters you wouldn't have the small so-called
10 disclaimer, "Paid for by Komite Amigos," or "Paid for by
11 the Carter- Mondale Presidential Committee?"

12 A I remember that the stuff that we received
13 from the Carter-Mondale, we were forced to put the disclaimer,
14 but on--but not on the Komite Amigos, because the Komite
15 Amigos, there are no Puerto Rican laws that require that.

16 Remember that in Puerto Rico the only time that
17 you have to put the disclaimer is when you use a t.v. station
18 or the radio, because they are regulated by the FCC.

19 Q Okay. Did you do any newspaper advertising
20 for Komite Amigos?

21 I don't know whether we got that testimony.

22 A Yes, we did. Until the date that we were
23 running the promotion of the radio marathon for fund raising.

24 Q But did you do any newspaper advertising after
25 that for Komite Amigos?

1
2
3 A I cannot recall. If there was any, it's in
4 the billing. We did any?

5 MS. GOMEZ: Yes, we did one. We did some.

6 THE DEPONENT: See, actually, in our aim, in
7 our plan, newspaper advertising was not a factor.

8 BY MR. WHITEHEAD: (resuming)

9 Q Correct.

10 A Right now, I could not remember quite well.
11 Maybe Miss Gomez can refresh us if there is
12 anything.

13 Q Well, I want to take those documents
14 individually at a later point in the deposition.

15 (Brief interruption.)
16

17 BY MR. WHITEHEAD: (resuming)

18 Q How many television advertisements did you
19 assemble for the Carter-Mondale campaign, for the Carter-
20 Mondale Presidential Committee?

21 A There was only one spot that was produced and
22 paid for by Carter-Mondale. And I am supplying to you a
23 tape with the different spots that were run.

24 This spot can be identified, the one that the
25 governor of Puerto Rico, Carlos Romero Barcelo, appears in

1
2 the t.v. spot speaking, making a speech at the very end.

3 MR. WHITEHEAD: Let the record show that
4 Mr. Franco has come this morning with a videotape
5 of certain advertisements which were part of the
6 Carter-Mondale primary campaign.

7 These are identified on the tape individually
8 and I am to ask Mr. Franco to further identify them
9 in his testimony.

10 BY MR. WHITEHEAD: (resuming)

11 Q Do you recall, just offhand, without going
12 into the records right now, how many times that particular--
13 what was the duration of that? How many seconds?

14 A That was a thirty second t.v. spot.

15 Q All right.

16 A And this spot was run in the last part of
17 the campaign. I'll say in the last seven or eight days of
18 the campaign.

19 And the decision to come up with this idea, with
20 this spot, the polls said that the campaign was very close,
21 you know, can go to either side, so then the decision of
22 Mr. Viera Martinez and the people involved in those days in
23 making decisions about the advertising, said that a spot in
24 which the governor makes a direct appeal will help.

25 So, this spot was produced. And then the instruction

1 was to run it with the Carter-Mondale Committee budget
2 money.

3 Q So, it is your testimony, then, that the
4 thirtysecond advertisement which features the governor--

5 A Speaking, because there is another spot in
6 which the governor appears.

7 Q But the one in which the governor is speaking
8 was to be shown and billed to the Carter-Mondale Presidential
9 Committee during the last few days of the primary campaign?

10 A That's right.

11 Q All right.

12 Are there any other commercials on that tape?

13 A Yes. In the tape are--there are four
14 commercials. The first one is the one that was created and
15 put in--put on the air to promote the radio marathon, the
16 fund raising activity.

17 The second one is a general appeal to people to
18 go to the polls and vote for Jimmy Carter.

19 Q Does that feature the governor in any way;
20 that second one?

21 A Yes. In that second one the governor appears
22 shaking hands with President Carter at the White House.

23 Q Right.

24 A In the third one, there was--it's the one I
25 am talking to you about; the governor making an appeal and

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1
2 talking.

3 The fourth one was another one that we created,
4 also to be run in the last week, which came out with a
5 new jingle. You know, the new jingle was most directly
6 to tell the people that a vote for Carter was a vote for
7 statehood. And that was so--we ran that one because we
8 thought that was important, that that could turn the tide.
9 And maybe it did, because finally, Mr. Carter won the primary.

10 Q What was the breakdown of delegates in the
11 primary?

12 A Twenty-one for Mr. Carter and twenty for
13 Mr. Kennedy.

14 Q Right. In the commercial advertising that's
15 part of this tape, that shows the governor shaking hands
16 with President Carter at the White House, who paid for the
17 airing of that, for the production of it and for the t.v.
18 spots?

19 A This was a news clip provided to us by ABC,
20 American Broadcasting Company, and we managed to get this
21 film clip from sources in Washington that we were acquainted
22 with.

23 Q And you put it together as part of the
24 commercial?

25 A Of the local made commercial.

1
2 Q Does that have a tag or a disclaimer at the
3 end of it?

4 Do you recall?

5 A Yes, "Paid by Komite Amigos de Jimmy Carter."

6 Q And who decided that that would be paid for
7 by the Komite Amigos?

8 A Well, it was obviously because most of the
9 money that was coming was from the Komite Amigos, locally
10 raised.

11 Q Was part of the radio marathon?

12 A Part of the radio marathon. And they also
13 ran small activities like cocktails, and you know, they
14 also went around the island soliciting money.

15 Q And whose decision was it to produce this
16 last one that had to do with a vote for Carter is a vote
17 for statehood?

18 A Well, I think it was my decision or my
19 suggestion, actually, since I was--I thought it was too
20 close, the race, you know, the primary was getting so close
21 and Mr. Kennedy's people were putting a lot of money; they
22 had a lot of money.

23 In that two weeks before the primary they had
24 three to one. They had three spots on the air and we only
25 had one.

1
2 They were beating us in money. So, also we saw
3 that we had to come up with something different. And since--
4 then I suggested about this idea and we came up with a new
5 jingle and with the idea of selling statehood, that a vote
6 for Mr. Carter is a vote for statehood.

7 And they bought that.

8 Q And whose disclaimer or tag was on that
9 particular advertisement?

10 A Comite Amigos.

11 Q Okay. In your office yesterday we viewed
12 the commercial that is part of that tape that shows the
13 singing and the dancing and the shaking of hands in the
14 Capitol.

15 One version of it had the disclaimer, "Paid for
16 by Comite Amigos," and the other version had a blank at
17 the end of the ad.

18 Do you remember that?

19 A I was talking to my producer and director
20 of production and he said that the copy that I first ran
21 for you was the--what we call the first mix that we do when
22 we are doing the editing of the commercial, and that is done
23 in the station and we call it VIDI Font.

24 Q Can you spell that?

25 A V-I-D-I F-O-N-T. That's put in front. It's

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1 a type, you know, when you see that on the t.v.

2
3 So, that was--it's put later, so the copy that
4 you actually saw yesterday morning in my office was the
5 first copy that comes from the editing room, and then the
6 VIDI Font is placed later with a special machine.

7 Q So, that--

8 A But he has a copy. The same t.v. spot, they
9 have it with the disclaimer, "Paid by Comite Amigos." And
10 that's the one that we put on the tape.

11 Q Right.

12 A The one that you have on the tape, they have
13 the disclaimer of Comite Amigos.

14 Q Right.

15 A The only one that doesn't have the disclaimer
16 is the one that was paid by the Carter-Mondale Committee.

17 Q And that was the one which involved the
18 governor--

19 A Right.

20 Q --talking?

21 A Talking and making an appeal.

22 Q And that does not have a disclaimer on it:
23 "Paid for by the Carter-Mondale Presidential Committee?"

24 A No. But that was the one that was--

25 Q But that's the one that they paid for?

1
2 A Right.

3 Q And paid for the placement of the t.v. spots?

4 A That's right.

5 Q Okay.

6 MR. WHITEHEAD: Off the record.

7
8 (Off the record.)

9 BY MR. WHITEHEAD: (resuming)

10 Q Before going into any of these records, let
11 me ask this question, Mr. Franco.

12 Were any of the ads on this particular tape
13 utilized, television ads, utilized by both committees?

14 A Let me tell you, I cannot recall quite well,
15 but it was a moment that, you know, in the very last week
16 that there was a lot of confusion and there were people who
17 were running scared. Let's put it this way.

18 That it was a matter to put the advertising on
19 the air, and we got instructions from many, many persons;
20 Mr. Viera Martinez, and then the governor sent a representative
21 to every meeting, that was Mr. Virgilio Ramos, and another
22 guy by the name of Pedro Rivera Casiano.

23 These people were working for the governor, and
24 since the governor's name was very much involved in this
25 campaign, and the prestige, it was a matter that the governor--

1
2 Mr. Carter had to win and the governor didn't want to lose
3 this primary.

4 So, Mr. Virgilio Ramos and Mr. Rivera Casiano
5 in the very last week got very much involved, as a matter
6 of fact, in the t.v. spots that I have been mentioning where
7 the governor appears at the very end, talking. Mr. Rivera
8 Casiano was involved in the production of that.

9 Those scenes that you see in the t.v. spots are
10 taken of the governor out in a rally in the island, one of
11 the small towns of the island. Mr. Casiano was the one who
12 directed that action. He was the one who told the governor
13 to be here, to talk this, you know.

14 We did the process of editing, you know, but Mr.
15 Rivera Casiano was the one--and he also wrote the initial
16 script of the spot. Then I revised it and I corrected
17 some things, but he did the initial script of that; what
18 is said in the t.v. spot, including the words said by the
19 governor.

20 So, that is what happened in the very last minutes.
21 So, it was a matter of putting advertising on the air. And
22 I cannot tell you which spots was paid by Carter-Mondale.
23 Probably it was a mix.

24 Q You mean by Comite Amigos?

25 A Well, probably a spot produced by Comite

1
2 Amigos was placed by the Carter-Mondale Committee. That's
3 what I attempted to say.

4 Q Did the Carter-Mondale Presidential Committee
5 people that you talked to see all the films that you had
6 produced?

7 A Evans Dovelie.

8 Q He saw each one of these?

9 A Oh, yes. He saw and he approved them.

10 Q He approved each one of the tapes?

11 A Yes, because remember, they were to be very
12 careful about what was to be said, you know. They have
13 to meet the regulations and the--the theme designed by the
14 Carter Committee has to be in relation for the campaign
15 in the states.

16 Q Did he see these before they went on t.v.
17 and approve of the ads?

18 A Oh, yes. And he approved the last amount
19 of money, the last amount of money that he don't want to
20 pay now, right?

21 MS. GOMEZ: (Nodding head in the affirmative.)

22 MR. WHITEHEAD: We will get into that.

23 BY MR. WHITEHEAD: (resuming)

24 Q The one commercial where the governor is
25

1
2 shaking hands with the President in Washington at the
3 White House, which yesterday we viewed, with no disclaimer
4 and which--and with a disclaimer, and which you have
5 testified to earlier in this deposition just a little while
6 back, did that particular advertisement get to be used
7 for the Carter-Mondale Presidential Committee and for the
8 Comite Amigos?

9 A Well, the production in the three commercials
10 that we are talking about, the one that he shakes hands
11 with the President at the White House, the one of the
12 fund raising and the one that we promoted the--

13 Q Statehood?

14 A --statehood, and the other, the regular
15 one; the one you see that there is a girl sitting in the
16 car, you know, those were paid by Comite Amigos.

17 The only one that was paid by the Carter-Mondale
18 fund was the one that I mentioned to you.

19 Q Which was the...?

20 A The governor speaking.

21 Q Okay.

22 A Now, we got--and that was produced by the
23 people--the governor's assistants. That was--they were
24 the ones that helped.

25 Mr. Dovel, as I mentioned to you, approved

1 certain amounts of money to run that spot.

2 And at this moment I cannot recall if the other
3 spots were running on t.v. paid by Carter money. I cannot
4 swear to that.

5 Q All right.

6 This may be a little bit on the redundant side
7 in connection with your testimony, but let's get into this
8 avenue of questioning.

9 In your affidavit of July 24th, 1981, that you
10 submitted to us at the Election Commission, you list the
11 following individuals as being, quote, involved in the
12 negotiations to contract your services, meaning Joe Franco &
13 Associates, for the Carter-Mondale Committee.

14 You list O'Connell, Dovel, Keefe, Viera Martinez
15 and Adalberto Jurado. This is in connection with the
16 Carter-Mondale Committee negotiations.

17 A Um-hum.

18 Q What role did Jurado play in the negotiations
19 of the contract for the Carter-Mondale committee?

20 A None.

21 Q None?

22 A That was a mistake, an error.

23 Q Did you have any written contract with either
24 the Carter-Mondale Presidential Committee or the Comite
25

1
2 Amigos?

3 A No, sir; shake hands.

4 Q Were any meetings held in which you, Miss
5 Gomez, were present in connection with the billing methods
6 for the two committees?

7 That is, the Carter-Mondale Presidential Committee
8 and the Comite Amigos de Jimmy Carter?

9 A (Ms.Gomez) Yes, I was present at the last
10 meeting that Evans Dovellev was here in Puerto Rico.

11 Q Do you have a date on that? Can you recall
12 the date?

13 A (Ms.Gomez) March 14th.

14 Q Was this the only meeting that you were
15 present at in which these various contract billing
16 negotiations were--

17 A (Ms.Gomez) Yes, sir.

18 Q Can you tell us who was present at that
19 meeting?

20 A (Ms.Gomez) Evans Dovellev, Virgilio Ramos,
21 Pedro Rivera Casiano, Angel Viera Martinez, and the people
22 from our office.

23 Q Neither Mr. Rodriguez nor Mr. Jurado were
24 present at that meeting?

25 A (Ms.Gomez) No.

1
2 Q All right.

3 Can you tell us what was said at that meeting,
4 or whom were your people from your office?

5 A (Ms.Gomez) Mr. Franco, Mr. Pena and myself.

6 Q Can you tell us what was said at that
7 meeting?

8 A (Ms.Gomez) Yes, Mr. Dovelie requested me
9 to present him all the invoices, because he was leaving
10 that day or the next day and he was going to approve them
11 for payment.

12 We presented him with the invoices; he signed
13 them and he took them with him.

14 Q Do you have those invoices, copy of those
15 invoices with you today?

16 A (Ms.Gomez) I have the copy that we keep
17 for our files.

18 Q Yes.

19 MR. WHITEHEAD: FEC Exhibit 1.

20 (The above-mentioned document
21 was marked as FEC Exhibit No. 1)

22
23 BY MR. WHITEHEAD: (resuming)

24 Q Miss Gomez, I am going to show you what has
25 been marked as FEC Exhibit 1, which purports to be a copy of

1
2 an invoice from Joe Franco & Associates, dated January
3 31st, 1980, to the Carter-Mondale Committee in care of
4 Senor Angel Viera, San Juan; and I would ask you if you
5 are familiar with that particular invoice?

6 A (Ms.Gomez) Yes, I am.

7 Q Can you tell me what it is?

8 A (Ms.Gomez) Yes, in here we are billing the
9 printing materials and the recording and cartridges that
10 were going to be used for the radio marathon.

11 Q Was that one of the invoices that Mr. Dovelie
12 took with him after the meeting that you just testified to?

13 A (Ms.Gomez) Yes, that was the one.

14 Q All right. Fine.

15
16 MR WHITEHEAD: Let me have this one marked
17 as FEC Exhibit 2.

18 (The above-mentioned document
19 was marked as FEC Exhibit No. 2)

20
21 BY MR. WHITEHEAD: (resuming)

22 Q Exhibit 1, in connection with FEC Exhibit 1
23 your testimony is that this is the billing to the Carter-
24 Mondale Committee for the radio marathon.

25 Now, from the testimony of Mr. Franco it is my

1
2 understanding that that was--that radio marathon was to
3 raise funds for the Comite Amigos de Jimmy Carter.

4 Do you have any knowledge of the difference between
5 the two, if there are any?

6 A (Ms. Gomez) No, I don't think that there are
7 any differences. This covers the printing of the covers
8 for the cans and the recordings.

9 Q Did anybody give you instructions as to
10 the billing of these; who they were to go to, this particular
11 invoice, FEC Exhibit 1?

12 A (Ms. Gomez) Usually, he orders me to whom
13 I am supposed to bill them.

14 Q Meaning Mr. Franco?

15 A (Ms. Gomez) Mr. Franco. And in the case of
16 printing, press or t.v., the media contract says to whom
17 we are going to bill.

18 MR. FRANCO: That was billed to whom?

19 MS. GOMEZ: Carter-Mondale.

20 MR. FRANCO: Maybe this is the explanation
21 for that: This was the first one that we billed,
22 right?

23 MS. GOMEZ: Right.

24 MR. FRANCO: What date does it have?

25 MR. WHITEHEAD: January, 31st.

1
2 MS. GOMEZ: January 31st, yes.

3 MR. FRANCO: Why January?

4 MS. GOMEZ: If it's typed in February, we
5 usually use the number for January, remember?

6 MR. FRANCO: Probably it's a mistake in the
7 date of the billing, because as I mentioned in my
8 testimony at the beginning, this occurred in the
9 month of February.

10 Now, let me tell you what could have happened.

11 Remember that in that meeting when Comite
12 Amigos was created, there was no funds, no money,
13 so probably these expenses were billed to the
14 Carter-Mondale Committee because they were the
15 people with the money.
16

17 BY MR. WHITEHEAD: (resuming)

18 Q But how do you account for the date of
19 January 31st?

20 A That's something that strikes me, because--

21 MS. GOMEZ: We do the billing one month
22 afterwards.

23 MS. FRANCO: No, but this is before it
24 occurs.

25 MS. GOMEZ; But if we typed that in February,

1
2 we always use the date of January 30th, referring
3 to those invoices that we are billing in that
4 moment. We bill a month afterwards; everything.
5

6 BY MR. WHITEHEAD: (resuming)

7 Q I don't think I understand that.

8 A (Ms.Gomez) In February we do the invoices
9 that belong to the month of January.

10 And even if invoices come in and we have to
11 type it, we give them dates and numbers belonging to
12 January. That's our system.

13 MR. FRANCO: But I have a suspicion that
14 probably right at the beginning, you know, Carter-
15 Mondale has some funds, the Komite Amigos has--
16 started having funds after the 23rd, remember?

17 MR. WHITEHEAD: Right.

18 MR. FRANCO: And I am sure that the Carter-
19 Mondale people took care of that.

20
21 BY MR. WHITEHEAD: (resuming)

22 Q I am not certain if I asked this question,
23 but I'll ask it again.

24 This FEC Exhibit 1, is this part of the invoices,
25 part of the group of invoices, page of the invoices that Mr.

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Dovelle approved before he left?

A (Ms.Gomez) No.

Q It was not?

A (Ms.Gomez) No.

Q And how do you know that?

A (Ms.Gomez) All the ones that he approved, we had to type that same date, March 14th, and they have the date.

Q I'll show you what has been identified as FEC Exhibit 2, which purports to be a copy of Joe Franco & Associates, Inc. invoice dated February 28th, 1980, addressed to the Carter-Mondale Committee, in care of Angel Viera Martinez; and I ask you if you are familiar with that particular invoice?

Can you tell us what that is?

A (Ms.Gomez) Yes, this is an invoice covering the publication of a press ad.

Q Do you have a copy of that bill?

A (Ms.Gomez) Yes, I have a copy of the ad, also.

Q Okay.

A (Ms.Gomez) This is the one.

MR. WHITEHAD: Let's call this FEC Exhibit 2-A.

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(The aforementioned document was
marked as FEC Exhibit 2-A.)

BY MR. WHITEHEAD: (resuming)

Q Miss Gomez, I show you what is a tear sheet
from the San Juan Star , February 1st, 1980, in which there
is a--about a third of a page advertisement featuring
the Jimmy Carter re-election, and I ask you if you are
familiar with that particular advertisement?

A (Ms.Gomez) Yes.

Q Is that the advertisement that is covered by
the invoice identified as FEC Exhibit 2?

A (Ms.Gomez) Yes.

Q Right.

A (Ms.Gomez) The one that belongs to the
San Juan Star?

Q Right.

MR. WHITEHEAD: And this will speak for
itself, of course, but the name at the bottom
is Viera Martinez of Carter-Mondale Committee,
campaign coordinator. Okay.

(The above-mentioned document
was marked as FEC Exhibit No. 3)

1
2 BY MR. WHITEHEAD: (resuming)

3 Q Miss Gomez, I am going to show you what
4 has been identified as FEC Exhibit 3, which consists of
5 four pages, purporting to be copies of invoices dated
6 February 29th, 1980, and identified further as your
7 number 80-2-43-P, and I would ask you if you are familiar
8 with that particular set of invoices?

9 A (Ms.Gomez) Yes. This covers the radio
10 and presidential promotions for the caucus.

11 Q Of the Carter-Mondale Committee?

12 A (Ms.Gomez) Right.

13 Q Now, would that cover the production and
14 transmission of these advertisements?

15 A (Ms.Gomez) Right.

16 Q Would that cover, to your knowledge--which
17 one of the tapes on this tape that you have supplied today
18 would this particular invoice cover?

19 A (Ms.Gomez) No, this covers radio--no, t.v.

20 Q I am sorry. My fault.

21 Was this part of the page that was given to
22 Mr. Dovellet?

23 A (Ms.Gomez) No.

24 Q No. All right.

25 MR. WHITEHEAD: Let's mark this one as FEC

1
2 Exhibit 4.

3 (The above-mentioned document
4 was marked as FEC Exhibit No. 4)

5 MR. RODRIGUEZ: Off the record.

6
7 (Off the record.)

8 BY MR. WHITEHEAD: (resuming)

9 Q Miss Gomez, I show you what has been marked
10 as FEC Exhibit 4 which consists of three pages purporting
11 to be a copy of an invoice from Joe Franco & Associates
12 dated February 29th, 1980, and it is further identified
13 as your invoice number 80-2-44-P. It is addressed to
14 the Carter-Mondale Committee, Box 2483, San Juan, Puerto
15 Rico, and I ask you if you are familiar with this?

16 A (Ms.Gomez) Yes. This invoice covers the
17 radio and presidential promotions for the inauguration of
18 the officers of the committee, the Carter-Mondale Committee.

19 Q For the opening?

20 A (Ms.Gomez) Yes.

21 Q Is that what you said?

22 A (Ms.Gomez) Yes.

23 Q Was there any advertisement involved with the
24 opening of the office, or was this for the press party?
25

1 I am not sure that I understand.

2 A (Ms.Gomez) Yes, there were radio spots
3 and press advertising increasing to the inauguration of
4 the committee.
5

6 Q I see.

7 MR. WHITEHEAD: Let's mark this one
8 FEC Exhibit 5-A.

9 (The above-mentioned document was
10 marked as FEC Exhibit 5-A.)
11

12 BY MR. WHITEHEAD: (resuming)

13 Q Miss Gomez, I show you what is a tear sheet
14 from the El Nuevo Dia of February 9th, 1980, in Spanish,
15 and I would ask you first if you are familiar with it,
16 and two, tell me what it is?

17 A (Ms.Gomez) Yes, this is the ad that was
18 billed to invoice 80-244.

19 Q Were radio messages similar to this type
20 of message that's in the ad?

21 A (Ms.Gomez) Yes.

22 Q That had to do with the opening of the
23 office?

24 A (Ms.Gomez) Yes.

25 Q All right.

70
MR. WHITEHEAD: Let's mark this as 6.

(The above-mentioned document
was marked as FEC Exhibit No. 6)

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BY MR. WHITEHEAD: (resuming)

Q Miss Gomez, I show you what purports to
be a copy of an invoice consisting of three pages, dated
March 14th, 1980, on the letterhead of Joe Franco &
Associates, further identified by your number 80-3-3P,
and I ask you if you are familiar with this particular
exhibit?

A (Ms.Gomez) Yes. This invoice covers the
t.v. spots telecast.

Q Now, this was addressed to the Carter-Mondale
Presidential Committee: S.Lee Kling.

A (Ms. Gomez) Right.

Q This differs from the previous invoices.
Can you tell us why there is a difference?

A (Ms.Gomez) Yes, this invoice belongs to
the group that I gave to Mr. Dovel, and when he gave me
instructions, he specified that I was to put Mr. Lee Kling's
name on the invoice.

Q And was this hand delivered to Mr. Dovel?
There was no mailing address.

1
2 A (Ms.Gomez) Right.

3 Q Hand delivered to him on the 14th of
4 March, 1980; is that correct?

5 A (Ms.Gomez) Right.

6 Q All right.

7 Was this particular series of television spots
8 authorized for payment, the amount--the total amount was
9 twenty-seven thousand, five hundred and ten; was this
10 authorized for payment by Mr. Dovelie?

11 Do you recall?

12 A (Ms.Gomez) Yes.

13 Q Were you paid for this particular invoice?

14 A (Ms.Gomez) Yes.

15 Q All right.

16 From previous testimony it appears that Carter-
17 Mondale only paid for television advertising which
18 involved the governor speaking at a rally.

19 To your knowledge, to Mr. Franco's knowledge,
20 are each and every one of these connected with that? These
21 meaning the billing on these invoices, connected with that
22 particular advertisement, and if so, how do you know?

23 A (Ms.Gomez) On page two of the invoice, on
24 the bottom part, we are also billing for the production of
25 the thirty second t.v. VTR process featuring President

1
2 Carter and Governor Romero Barcelo.

3 Q On the exhibit there is some of the print
4 that does not come across.

5 A (Ms.Gomez) No, that was erased and the
6 continuation goes onto page three.

7 Q You are right.

8 So, it is this ad--this ad was produced and this
9 is the ad that was shown on these various t.v. spots which
10 involved the governor being--wait a minute. Let's go off
11 the record here.

12 (Off the record.)

13
14 BY MR. WHITEHEAD: (resuming)

15 Q Miss Gomez, this invoice reflects the payment
16 for the production of the ad that you speak of?

17 A Right.

18 Q It also reflects the payment for the telecast
19 of various advertisements, of thirty seconds duration, on
20 t.v. stations; is that not correct?

21 A (Ms.Gomez) Correct.

22 Q Did the payment for the commercials on the
23 t.v. stations include commercials that were both Comite
24 Amigos advertisements, the jingle with the girl singing on
25 the Carter-Mondale advertisements which involved the governor?

1
2 A (Ms.Gomez) Do you refer to this invoice?

3 Q Yes, this particular invoice.

4 A (Ms.Gomez) No, I think this invoice covers
5 this same spot for which we are billing the production, and
6 the ones that were telecast.

7 Q Does not cover the billing of the Comite
8 Amigos' telecast?

9 A (Ms.Gomez) No.

10 Q It does not. All right.

11 MR. WHITEHEAD: Let me now identify for the
12 record FEC Exhibit 7, which consists of four
13 pages.
14

15 (The above-mentioned document was
16 marked as FEC Exhibit No. 7)

17 BY MR. WHITEHEAD: (resuming)

18 Q As I stated, this consists of four pages,
19 purporting to be copies of Joe Franco & Associates invoices,
20 all dated March 14th, 1980, and further identified as
21 invoice number 80-32--I am sorry--80-3-2P; 80-3-4P; 80-3-5P
22 and finally, 80-3-6P.

23 In two instances it is addressed to Carter-Mondale
24 Presidential Committee, Kling, Treasurer. And in two
25

1 instances Mr. Kling's name does not appear.

2 Can you identify those for me?

3 A (Ms.Gomez) These are the other invoices
4 that were hand delivered to Mr. Dovellev.
5

6 Q Were part of the pages that were hand delivered
7 to Mr. Dovellev?

8 A (Ms.Gomez) Correct.

9 Q All right.

10 And Mr. Dovellev authorized the payment of these
11 particular invoices?

12 A (Ms.Gomez) Yes, he did.

13 Q And do you have anything that is there,
14 anything written on this that shows the authorization
15 for payment?

16 A (Ms.Gomez) Yes. Within one of them there
17 is his signature and it says "Approved, Carter-Mondale
18 Presidential Committe, Evans Dovellev," and the date.

19 Q And is that on invoice number 83--

20 A (Ms.Gomez) 80-3-6P.

21 Q Are you familiar with Mr. Dovellev's signature?

22 A (Ms.Gomez) Yes.

23 Q How did you come about this familiarity?

24 A (Ms.Gomez) He signed them in front of me.

25 Q He signed these?

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A (Ms.Gomez) He has written to us, also.

Q But he signed these, personally, the original of these was signed personally?

A (Ms.Gomez) (Nodding head in the affirmative.)

Q Does he have the original and you have a copy; is that it?

A (Ms.Gomez) I have copies in only one of them. I have his signature. I don't recall why I don't have the others.

Q Did he give you back the original?

A (Ms.Gomez) He did not. He took them with him.

Q Do you recall that he signed all copies, or just your copy?

A (Ms.Gomez) What happens is our invoices have carbon copy and he signed them with a carbon copy.

Q Before going into this, did there come a time when Mr. Dovellet told you that--well, let me ask this, first.

Mr. Franco, what was the total billing to the Carter-Mondale Presidential Committee, or Miss Gomez, either way?

A Close to sixty thousand.

MS. GOMEZ: Sixty-three thousand dollars.

1
2 BY MR. WHITEHEAD: (resuming)

3 Q And how much of that particular billing
4 was paid by the Carter-Mondale Committee?

5 A (Ms.Gomez) Thirty-nine thousand.

6 Q Did there come a time when Mr. Dovelie
7 disputed the entire bill of sixty-three thousand?

8 A (Ms.Gomez) He agreed to pay thirty thousand,
9 but he disputed the others.

10 Later on he paid the additional nine thousand.

11 That was all.

12 Q Do you have a copy of his letter?

13 A (Ms.Gomez) I have this here. I don't have
14 a copy.

15 I think I mailed one to you.

16 MR. RODRIGUEZ: March 9th letter to you.

17 MS. CALLAHAN: Yes, I have a copy.

18 BY MR. WHITEHEAD (resuming)

19 Q So, we have been provided by you previously
20 the letter of Mr. Dovelie. Okay. It is part of our
21 records.

22 In effect, he authorized payment of thirty
23 thousand, and of nine thousand, and disputed the rest?

24 A (Ms.Gomez) He first disputed the balance
25

1
2 of thirty thousand.

3 Q Right.

4 A (Ms.Gomez) But later on he sent us a check
5 for nine thousand.

6 Q Leaving the balance unpaid?

7 A (Ms.Gomez) Right.

8 Q Did you take any legal steps towards the
9 collection of that?

10 A Yes, sir. We did. And through our legal
11 counsel, Mr. Luis Rodriguez Bigas.

12 Q Did you obtain a judgment?

13 A Frankly, Mr. Rodriguez Bigas is more
14 acquainted.

15 Yes, we have a judgment here, civil case 80-2169,
16 and this was in the United States District Court for the
17 District of Puerto Rico.

18 Q What is the date on that?

19 A That was February 4th, 1982.

20 Q Have you ever collected on that judgment?

21 A No, sir.

22 Q All right.

23
24 (Document marked as FEC Exhibit
25 No. 8.)

1
2 BY MR. WHITEHEAD: (resuming)

3 Q Miss Gomez, let me show you what has been
4 identified as FEC Exhibit 8, which purports to be a copy
5 of Joe Franco & Associates invoice dated May 30th, 1980;
6 invoice number 80-5-31P. It is addressed to Comite Amigos
7 de Jimmy Carter, Hato Rey, Puerto Rico: Attention: A.Viera
8 Martinez.

9 Can you tell me if you are familiar with that?

10 A (Ms.Gomez) Yes, this invoice covers a
11 radio promotion after the primaries were held. They wanted
12 to raise some money and they held like a fair in the
13 premises of the committee, and these were the radio spots
14 covering that event.

15 Q The Comite Amigos de Jimmy Carter.

16 Why did you send the bill to Viera Martinez?

17 A (Ms.Gomez) Because he was the person in
18 charge.

19 Q He was in charge of the Comite Amigos
20 activities?

21 A (Ms.Gomez) Right.

22 Q A fund raiser?

23 A (Ms.Gomez) Right.

24 Q Why did that fund raiser come about?

25 A (Ms.Gomez) I don't recall. Mr. Franco?

1

Q Mr. Franco, can you testify as to that?

2

3

A The results you mean? How much money was

4

produced?

5

Q No, why did you get involved and why did

6

Mr. Viera Martinez get involved?

7

A Well, after the primary, the Carter-Mondale

8

Committee and Comite Amigos de Jimmy Carter owes us a lot

9

of money of unpaid bills.

10

So, it was a matter that we were involved and

11

we have to help. So, they run some activities to raise

12

money so they can pay us.

13

So, Mr. Viera Martinez called us and he says, I

14

have to--this is one of several activities I am planning

15

to run in the next month in order to pay you back. And this

16

is one of the activities.

17

Q Let me have that. Thank you.

18

Whose idea was this?

19

A Mr. Viera Martinez.

20

Q Was Mr. Jurado involved?

21

A He was involved.

22

Q Was Mr. Rodriguez involved?

23

A Yes, he was there. I saw him during the

24

activities.

25

Q The fund raiser?

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3 4 0 4 0 4 8 2 3 6 7

1
2 A He was involved, but he was not as involved
3 as Mr. Jurado. Mr. Jurado was involved.

4 Q Did you have any part to play in this fund-
5 raiser?

6 A The only thing, I believe I designed the ad
7 and placed the ad. That's all.

8 Q Did you mention to Mr. Viera Martinez that
9 you were owed money by the Carter-Mondale people?

10 A Oh, yes.

11 Q And did you mention that you were also owed
12 money by the Comite Amigos?

13 A Yes, we presented to him a statement of
14 account right after the primary was over.

15 Q You gave the statement of account to Mr.
16 Viera Martinez for both committees?

17 A For both.

18 Q The Comite Amigos and for the Carter-Mondale
19 Presidential Committee?

20 A Yes, because a very strange situation
21 developed.

22 The fellow that was supposed to be head--that was
23 the head of the Comite Amigos de Jimmy Carter, attorney
24 Perez Rodriguez--Manuel Perez Rodriguez, he has a very--
25 how do you say it? He don't have much to do with the

1
2 committee at all, you know. He was--he seemed to be a
3 figurehead. Let's put it that way.

4 And so he was not involved. He was there, you
5 know.

6 Q But whose idea was it to have the fund
7 raiser? How did that develop, I mean?

8 A It was Mr. Viera Martinez, because he was
9 the one that was responsible, see? He was the coordinator
10 of the campaign.

11 Q Which campaign?

12 A Of the Jimmy Carter for President in the
13 primary.

14 Q Both? I mean he was the coordinator for
15 the Carter-Mondale Committee?

16 A Right.

17 Q What about the Comite Amigos?

18 A Well, the Comite Amigos was supposed to run
19 separately, but actually Viera Martinez was the one that
20 was in charge, and he has the moral commitment that he has
21 to raise the money or help these people in raising the
22 money.

23 Q Did you present Mr. Viera Martinez with
24 bills for both the Carter-Mondale Presidential Committee
25 and for the Comite Amigos?

1
2 A Yes, sir.

3 Q When did you do that?

4 A Weeks after the primary. And he told me that
5 out of the sixty-three thousand dollars owed by the Carter-
6 Mondale Committee, I was supposed to get that money from
7 the Carter-Mondale Committee in the states.

8 And that's when Mr. Evans Dovellev starting
9 disputing our claim, that he never authorized that money.
10 But Mr. Viera Martinez says all the time--all the time
11 said that he authorized that, because the day that Evans
12 Dovellev authorized that, Mr. Viera Martinez was there.

13 Q But what was Mr. Viera Martinez's connection
14 with the outstanding bill for the Comite Amigos?

15 A Well, since the Comite Amigos was developed
16 or created by the Carter-Mondale people, and he was the
17 coordinator of the Carter-Mondale Presidential campaign
18 in Puerto Rico, he has a moral commitment with us.

19 Q Did he say to you, "I have a commitment to
20 cover all of the moneys that you spent for the Comite
21 Amigos?"

22 You say he has a moral commitment. What do
23 you mean by that?

24 A Moral commitment is that, you know, I put
25 you in this problem. I know that you used your money,

1
2 you paid everybody, now we have to look for the funds to
3 pay you back.

4 Q Did he say that to you?

5 A Yes. And he started several activities like
6 this one you just brought in, these radio ads.

7 Q How much money are you owed by the Comite
8 Amigos?

9 A Close to one hundred twenty-five thousand--
10 let me check with Miss Gomez.

11 The total debt by Comite Amigos de Jimmy Carter
12 is one hundred twenty-four thousand, eight hundred fifty-
13 eight and thirty -seven cents.

14 Q What was the original figure?

15 A (Ms.Gomez) Almost two hundred fifty.

16 MR..FRANCO: Almost two hundred and fifty
17 thousand dollars.

18 BY MR. WHITEHEAD: (resuming)

19 Q And how much was raised at this fund raiser;
20 do you recall?

21 A It was a failure.

22 Q Do you have any figures?

23 MS. GOMEZ: No.

24 MR. FRANCO: I am saying that it was a
25 failure. We don't receive any payments from the

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proceeds, from the collection they did on that activity.

BY MR. WHITEHEAD: (resuming)

Q So, Mr. Martinez--neither Viera Martinez nor Mr. Jurado gave you any money as a result of this fund raiser that this exhibit covers, the radio spots?

A No.

Q Was there another fund raiser held besides this particular fund raiser that we are discussing? The one that involved a dance?

MS. GOMEZ: Yes.

BY MR. WHITEHEAD: (resuming)

Q Could you tell us about that one?

A She has the dates. Mr. Viera Martinez came up with an idea about having--

MS. GOMEZ: May 16th.

MR. FRANCO: May 16th, having a victory party to celebrate that they won the primary in Puerto Rico. And again, since they owed us the money we tried to be helpful so it would be a success.

But, again, the timing was wrong. You know, people were fed up with too many things going. And

1
2 it seems to me that they--that he don't get the
3 cooperation from the volunteers.

4 Again, this activity was a flop.

5 BY MR. WHITEHEAD: (resuming)

6 Q They did raise some money at this one, though?

7 A They raised money, but the expenses--

8 Q How much did you get?

9 A How much did we get from that?

10 MS. GOMEZ: We got a check for thirty-one
11 thousand dollars, but we had paid for expenses
12 for that same activity, so...
13

14 BY MR. WHITEHEAD: (resuming)

15 Q How much were your expenses?

16 A Twenty-one thousand dollars.

17 Q So, you netted ten thousand out of the--

18 MS. GOMEZ: (Nodding head in the affirmative.)

19 BY MR. WHITEHEAD: (resuming)

20 Q Was Adalberto Jurado involved in this
21 activity, also?

22 A Oh, yes, he was very much involved. And the
23 president of the committee, also.

24 Q Mr. Rodriguez?

25 A He had a concerned participation. Yes, because

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1
2 at that time everybody thought that they had to get involved
3 and help in paying that debt they owe us.

4 Q Okay. Let me tell you what was the other
5 one.

6 Was it much later?

7 A (Ms. Gomez) At the end of July or August.

8 MR. FRANCO: By the end of July, still, Mr.
9 Viera Martinez was, you know, he was really
10 concerned about this enormous debt that the Comité
11 Amigos of Jimmy Carter had with us; that they
12 realized other activities--they come up with
13 another activity, but this activity was--instead
14 of being like a celebration of Carter's victory,
15 or something like that, the theme of the activity
16 was like an appreciation activity, in appreciation
17 of Mr. Viera Martinez's activity as a politician.

18 So, this one was very productive, you know.
19 And Mr.--even though this thing was not related
20 to the Comité Amigos or to the Carter-Mondale
21 activity, Mr. Viera Martinez gave to us the--what
22 this activity netted, to us.

23
24 BY MR. WHITEHEAD: (resuming)

25 Q What was that figure?

1
2 A That was--that was how much?

3 MS. GOMEZ: Thirty-two thousand, seven
4 hundred thirty-three.

5 BY MR. WHITEHEAD: (resuming)

6 Q But it is your testimony that this activity
7 was really for--in honor of Viera Martinez as a politician,
8 and no connection with Carter-Mondale?

9 A No connection. But the money was collected
10 thereafter, the expenses repaid. He had--he gave it to
11 us so that we--

12 Q Could reduce...?

13 A Reduce the amount of the debt of Comite
14 Amigos.

15 MR. WHITEHEAD: We are going to take a five
16 or ten minute break and try to wrap this whole
17 thing up.

18
19 (Luncheon recess.)

20 A F T E R N O O N S E S S I O N

21
22 MR. WHITEHEAD: Back on the record.

23 BY MR. WHITEHEAD: (resuming)

24 Q Mr. Franco, you have testified that you
25 had hand-shakes; there were no written contracts between

1
2 Carter-Mondale or Comite Amigos.

3 Is that right?

4 A That's right.

5 Q But you did have understandings in the nature
6 of oral understandings; did you not?

7 A That is correct.

8 Q Were you--were there any differences between
9 your understanding with Comite Amigos and your understanding
10 with Carter-Mondale?

11 A Well, I had instructions in billing.

12 For example, how much money I have to bill against
13 the Carter-Mondale Committee and how much money I have to
14 bill against the Comite Amigos de Jimmy Carter.

15 Q All right.

16 Again, you probably have testified to this, but
17 whom did you have these discussions with in connection with
18 the different billings?

19 Who was involved?

20 A At the beginning, as I mentioned to you in
21 my testimony, at the beginning there was several people
22 involved, but when the thing started in action, when we
23 started working, Mr. Viera Martinez was the one that we
24 had to report to, that we had to get the okay from him only
25 on matters related to Carter-Mondale; that for additional

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money it had to be approved by Mr. Dovellev.

That's when he agreed to send sixty-three thousand dollars, because at the beginning we were talking about twenty-five thousand dollars on the Carter-Mondale.

Then because of the pressure put on by Mr. Viera Martinez was that they agreed to send more money to Puerto Rico.

Q Who was--to your knowledge, who was Mr. Viera Martinez putting the pressure on?

A Well, actually, the coordinator was O'Connell, but I believe that there was several people involved, and he was communicating with the people in the states.

Q Viera Martinez?

A Viera Martinez.

Q Mr. O'Connell did not?

A I imagine O'Connell, too.

Q Did O'Connell ever sit down with you and tell you who was to be billed for what?

A No.

Q Did Dovellev ever sit down with you and say who was to be billed for the various advertisements?

A Well, please remember that from the beginning we were talking about twenty-five thousand dollars to be spent by Carter-Mondale.

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1

Q Right.

2

3

A Then when more money was needed, particularly

4

to put on the air that spot that I mentioned to you, that

5

appeared the governor of Puerto Rico with a direct appeal

6

to the voters, that for that particular spot that was Mr.

7

Dovelle that approved more money.

8

And then--

9

Q Was he present when he approved--was he here

10

in Puerto Rico when he approved it?

11

A Yes.

12

Q In Puerto Rico?

13

A Oh, yes, in that meeting besides him was

14

Mr. Virgilio Ramos; was Mr. Angel Viera Martinez.

15

As a matter of fact, you know, he refused at the

16

beginning to put up more money. But then, when he realized,

17

he was told on the air that the primary was so damn close

18

that Carter might lose in Puerto Rico, he got some pressure

19

from some people of the governor and he called me from there,

20

from the governor's office one morning to tell me to go

21

ahead with the production of the new message; that he would

22

be in my office to approve the additional money.

23

I received that call from Mr. Dovelle.

24

Q What date was that?

25

A It was a Saturday.

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1 Q Prior to the--

2 A A Saturday morning, because I remember that
3 I was in my office with only my production people, because
4 we don't work on Saturdays. And I got that call over there.
5

6 And we were expecting his call in order to--the
7 very next day, that was a Sunday--send my crew to this
8 town called Gurabo in Puerto Rico where the governor was
9 supposed to be in a rally, and we were supposed to shoot
10 some scenes in that rally to incorporate that scene into
11 this spot.

12 Q Did Viera Martinez have any decision in
13 how much was to be billed to Comite Amigos?

14 A Indirectly, yes, because he was the one
15 who approved everything.

16 Remember--

17 Q When you say he approved everything--

18 A Remember there was an initial program of
19 two hundred fifty thousand dollars.

20 Q I remember that. It's in your testimony.
21 That's what I'm trying to get at.

22 So, we are talking in terms of the difference of
23 two hundred fifty thousand and sixty-three thousand. Is it
24 your testimony that Viera Martinez approved the disposition
25 of the one hundred sixty-five thousand--the difference which

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1
2 comes to about one hundred sixty-five thousand; was he in
3 on the decision to bill--was he in on the decision to bill
4 Comite?

5 A He was in on the decision.

6 Q Comite Amigos?

7 A Right. Let me tell you again.

8 When Dovelie finally accepted to go ahead and
9 spend more money, that meeting was held Friday at my
10 office, Friday night. And Mr. Dovelie didn't make any
11 commitments on that night. It was the very next day that
12 he called me from Fortaleza, that's the governor's mansion,
13 to tell me to go ahead.

14 Q But I still--how does that explain Viera
15 Martinez's involvement with Comite Amigos; billing them?

16 You are billing them from a twenty-five thousand
17 dollar figure to a sixty-three thousand dollar figure.

18 But the question is: were there different billing
19 methods in connection with Comite Amigos money and Carter-
20 Mondale money, that twenty-five thousand?

21 A Well, see, Mr. Viera Martinez was the
22 coordinator of the campaign. He was in charge. At the
23 beginning we thought that the total was to be paid by the
24 Carter-Mondale Committee, but since they don't have the
25 funds, they created this Comite of Amigos.

1
2 But the Comite Amigos was not generating the
3 funds as fast as we--remember that we started with one
4 hundred twenty-five thousand, but then the additional funds
5 were not coming.

6 So, Mr. Viera Martinez appealed to the Carter-
7 Mondale Committee to put more money.

8 Q Into what?

9 A Into the campaign.

10 Q Into the Carter-Mondale campaign?

11 A At one stage the campaign blends itself. It
12 was not two different campaigns. It was one campaign, let's
13 put it that way.

14 Q It was two different committees?

15 A There were two committees.

16 Q Did they blend, the two committees?

17 A That's right.

18 So, their aim was the same.

19 Q Was Dovelie involved in any of this blending
20 between the two committees?

21 A Well, he tried to be separate from the
22 Comite Amigos. He refrained from getting involved with
23 the Comite Amigos.

24 Q Was Jurado involved?

25 A Jurado was involved.

1

2

3

Q Was he working with Martinez at your office or...?

4

A No, never attended the meetings.

5

6

Jurado's mission was to pay the checks; to write the checks and sign the checks.

7

8

Q Were there any differences in the billing agreed upon for Komite Amigos and for Carter-Mondale?

9

A Oh, yes.

10

Q Who made the decision as to those billings?

11

12

A In the first meeting the lawyer specified that there was only twenty-five thousand available. Okay.

13

14

15

16

17

And we worked around the twenty-five thousand dollar figure. But--when things get in a manner that we might lose the election because Kennedy was spending a lot of money, then Mr. Viera Martinez put pressure and that's where the other money came from.

18

Q But it was Viera Martinez?

19

20

21

22

A Oh, yes. Viera Martinez made the appeal and he made--he saw it was necessary to put more spots on the air, and since the Komite Amigos had no money at that moment, I was financing the Komite Amigos myself.

23

Q I know that.

24

25

Do you normally have written contracts with your clients, either political or non-political?

3 4 0 4 0 4 8 2 3 3 2

1
2 A Let me tell you; we have different ways
3 to run a campaign.

4 Actually, certain clients ask for a contract;
5 other clients don't ask for anything.

6 At this moment I don't have contracts, I'll say
7 for more than forty per cent of our clients. So, it's
8 not normal that--

9 Q It's not normal.

10 A There are certain corporations that they
11 rarely ask for a contract because they want to be
12 protected, you know, against something happening against
13 them, you know; claims.

14 Q So it wasn't anything abnormal for you to
15 have oral contracts with the Carter-Mondale?

16 A Right. As a matter of fact, the previous
17 campaign that we did for Mr. Bush, we don't have any
18 contracts at all. It was run on the same basis.

19 Q Did Terry O'Connell ever express to you any
20 approval or disapproval of the tactics that you were
21 using--the campaign that you were doing for the Comite
22 Amigos?

23 A Terry O'Connell, the only time that he had
24 to say something with--about a particular production or
25 announcement was two weeks before the campaign; that Ted

1
2 Kennedy came up with a very effective commercial where
3 he appears and he talks and at the very end he said
4 "A la victoria," to the victory.

5 At the very end he said to the victory, in
6 Spanish, "a la victoria." So, it was a very effective
7 commercial. It was creating a lot of--how do you call it--
8 momentum for his campaign.

9 Q Right.

10 A So, we knew that we had to come back and
11 fight that thing. So we came up with the idea that we
12 would turn around the word victory, to the victory, to
13 the defeat.

14 Because in Spanish when you say "a la victoria,"
15 we said "a la derota." And he did it, and he said it with
16 a very particular accent, that he said "a la victoria," so
17 we turned it around to "a la derota." Because he was
18 defeated in seven different places before his primary.
19 He was defeated in others.

20 So, we said in Vermont he was defeated, in such
21 and such a place he was defeated. So at the very end we
22 put a guy imitating his voice and said "a la derota."

23 So, what happened, that that particular thing,
24 you know, was some sort of a dirty trick. It was plain
25 but it was effective.

1
2 So, Terry O'Connell was the one--Dovelle was
3 not in Puerto Rico in those days, so we needed somebody
4 from the Carter committee to make an approval for that.

5 So, Terry O'Connell, he made the decision. He
6 liked it. He said, "Okay, let's put it on the air."

7 Q This was Comite Amigos' ad?

8 A It was Comite Amigos, yes.

9 Q And O'Connell said it was all right, put it
10 on the air?

11 A Yes, he agreed.

12 Q He agreed.

13 We didn't see any tape. We saw positive tapes for
14 the election of Carter.

15 A That is the radio.

16 MS. GOMEZ: That's radio.

17 MR. FRANCO: We can provide you with a copy
18 of that.

19
20 BY MR. WHITEHEAD: (resuming)

21 Q Okay.

22 A That was radio. It was just radio because,
23 you know, you have to use the imagination.

24 Q All right.

25 So, O'Connell heard this radio advertisement and

1
2 approved it?

3 A Yes. It was Viera Martinez, O'Connell and
4 Virgilio Ramos. And, you know, they listened to the thing.
5 It was very controversial, I tell you. I believe that's
6 what-the thing that turned the results.

7 MR. RODRIGUEZ: It was really something.

8
9 BY MR. WHITEHEAD: (resuming)

10 Q Did you--O'Connell has indicated that he
11 met you at a meeting in January, at a state committee
12 meeting.

13 Are you familiar with that?

14 A O'Connell said that?

15 Q He says, I recall being introduced to Mr.
16 Franco at a state committee meeting in mid or late January,
17 1980.

18 A Yes, that was a meeting that was held in--
19 I believe that was in Roberto Clemente Coliseum. They were
20 having a meeting and that was one of the meetings they had
21 to get rid of Mr.--they were putting the charges against
22 Franklin Delano Lopez.

23 That was a meeting, you know, the Democratic Party
24 counsel got together to get rid, and Terry O'Connell was
25 there.

1
2 Q Is this prior to the meeting that you held
3 with O'Connell in Viera Martinez's office in the State
4 Capitol?

5 A Oh, yes.

6 Q So, that was not the first time you met him,
7 at the State Capitol?

8 A No. O'Connell--I had seen O'Connell that
9 time, probably another time, too. You know, because this
10 is a guy that he is recognizable.

11 You know, he is a Vietnam veteran and he don't
12 have one arm. So, you can recognize a guy like that.

13 Q Was he the one that explained the rules, the
14 FEC rules about the Federal Election campaign rules?

15 Was O'Connell the one who explained it to you at
16 any time?

17 A No, it was the lawyer. But he helped, yes,
18 in the explanation, you know.

19 He got--saying, if the lawyers says something, he
20 said we have to be careful.

21 Q I see. There were two?

22 A Yes, O'Connell was there.

23 Then, also, I met--I saw O'Connell in a Condado
24 apartment, in a home that he was there. They were trying to
25 get some money for the Carter-Mondale Committee.

1
2 I had nothing to do with that. I was there just
3 to have pizza and beer.

4 Q You stated that Rodriguez, the president...

5 A Of the committee.

6 Q ...the president.

7 A He was a figurehead.

8 Q Was he involved in any meetings at which
9 strategy was discussed?

10 A None.

11 Q How do you know that he was a figurehead?

12 A It happened that I met the guy later, you
13 know, he said I just keep my name to help Mr. Viera Martinez;
14 he needs somebody.

15 Q Jurado had said in an affidavit back in
16 May 9th--

17 A Who is that?

18 Q Jurado, May 9th.

19 He said that he was present in your office for
20 one meeting with the Carter-Mondale officials to discuss
21 two separate contracts.

22 A Separate contracts?

23 Q Did you meet with Jurado any time other than
24 the meeting at the State Capitol which he came over to?

25 A Oh, yes, several times.

1 Q You have testified to that.

2 Did you meet with Jurado at any other meeting
3 other than at the State Capitol at which the other Carter-
4 Mondale Committee people were there?
5

6 A Frankly, I cannot remember.

7 I know that sometimes he used to come to my
8 office with Mr. Viera Martinez, but not--but I don't
9 remember that he was in a meeting with Terry O'Connell or--

10 Q He has been to your office with Viera
11 Martinez?

12 A Oh, yes.

13 Q And they discussed--he was present when you
14 discussed the business of Comite Amigos?

15 A Right.

16 Q And Carter-Mondale business?

17 A Right. That's right.

18 Q All right.

19 In your response of May 5th, 1982, your
20 affidavit, you said that the two committees had separate
21 accounts but that the orders and decisions were made by
22 Dovellet and Martinez, who also supplied the materials.

23 Is that true?

24 A Yes. But let's qualify that answer.

25 Q Go ahead.

1
2 A Yes. Dovellet and Martinez were working
3 together, let's say in the last three weeks previous to
4 the primary date.

5 In other words, they were communicating very
6 often, and many times--every time that we'd come to the
7 office to discuss planning and the next step to be taken
8 in the campaign, most of the time they were together.

9 Q So, they came together?

10 A Yes, several times. I cannot tell you
11 how many times, but there were several times.

12 Q Who decided whether you should run t.v.
13 ads, newspaper ads?

14 Did they work together on this or did each have
15 an independent authority?

16 A Well, I'd say that the Carter people, either
17 Dovellet or Terry, had the last word. It has to be something
18 referring to the standard procedure of how to run the
19 campaign of Jimmy Carter, of the t.v. advertising strategy,
20 see?

21 Dovellet or Terry O'Connell. But they don't have
22 to say much about--of the ideas, let's say on the creative
23 ideas.

24 Viera Martinez was the one to say the last word.
25 But this is important to say here; that also, Dovellet was

1
2 in those days working more with Virgilio Ramos, because it
3 turned out at the moment that the governor was getting
4 really worried about the outcome of this.

5 So, Virgilio Ramos was very close with Mr.
6 Dovellet, you know, because they were interested in the
7 thing coming out the right way.

8 I am going to tell you, once--one incident. For
9 example, that the person--the people from Fortaleza, this
10 guy Rivera Casiano, came up with an idea of doing a t.v.
11 spot where a girl will come in--come up in a shadow with
12 a resemblance to Mary Joe Kopechne, you know, something
13 macabre, you know, that says this is Mary Joe, where are
14 you today. Something like that.

15 So, I opposed that myself. I said no, that won't
16 go. But, you know, the guy, that guy Casiano was sold on
17 the idea and I told him no, that the agency don't want to
18 be involved in that production. We don't want nothing to
19 do with that thing.

20 You know, and in that particular night Dovellet
21 was there and he made the decision not to run that.

22 Q If you have any questions concerning the
23 preparation or the development or the placement of Comite
24 Amigos' ads, who did you ask? Who did you get an answer
25 from?

1
2 A From Viera Martinez.

3 Q If you had any questions about the
4 production, development or placement of Carter-Mondale
5 Committee ads, who did you ask?

6 A Viera Martinez.

7 Q Now, we have gone over this a little bit
8 this morning, in fact, more than a little bit. But let
9 me ask it one more time.

10 In your affidavit of July 12th, 1982, you stated
11 that you prepared material for one campaign; that is Carter-
12 Mondale campaign, Comite Amigos campaign, and it was used
13 by both committees.

14 A Yes, it's true, because like I said, for
15 example, poster materials, bumper stickers, brochures
16 provided by Carter-Mondale were at the same time handed to
17 the Comite Amigos, who were actually the people with the
18 volunteers, you know, to deliver the things; to put them
19 in the different places.

20 Q How did you propose or decide which ads,
21 both t.v. and newspaper, or any ads that were in newspapers
22 or t.v., which ads were for Comite Amigos and which were
23 for Carter-Mondale?

24 A Well, the decision was made actually on
25 billing procedures. Let's say we decided, okay, who is going

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34048239C

1
2 to pay for this production? And we knew that we were
3 working with a very limited budget in the Carter-Mondale
4 Committee.

5 So, most of the things had to be relied upon to
6 the Comite Amigos. It came to a moment that, you know, we
7 were trying to do a job and trying to please, to succeed,
8 you know. And in those days things like that--we were not
9 that careful to follow the procedures.

10 Q The governor's ad, the ad where the governor
11 is making the speech, that was the spot at the particular
12 rally that you mentioned; when was that paid--I'm sorry,
13 it was paid by the Carter-Mondale Committee, when--but when
14 was it developed in relation to the other ads that we have
15 on this tape?

16 A No, I don't think they paid for that ad.
17 Did they pay? That's part of the last--did they
18 pay?

19 MS. GOMEZ: Yes.

20 MR. FRANCO: The truth, I am not that
21 familiar with the billing, you know.

22 BY MR. WHITEHEAD: (resuming)

23 Q When was that developed?

24 A Dovelie approved about twenty-seven thousand
25

1
2 dollars for that particular ad.

3 See if I am right?

4 MR. RODRIGUEZ: I think that you should
5 rephrase the question.

6 MR. WHITEHEAD: Sure.

7
8 BY MR. WHITEHEAD: (resuming)

9 Q We are talking about the governor's ad where
10 the governor is making a speech.

11 A Right.

12 Q Not the one where he is shaking hands.

13 A The one at the rally.

14 Q Right.

15 When was--the first thing is, when was that
16 developed in relation to the other t.v. ads that you had?

17 A Oh, I'd say that that was the last production
18 that we did. The last one.

19 Q Was that paid for by the Carter-Mondale
20 Committee?

21 A It was paid by Carter-Mondale Committee.

22 Q All right.

23 In your affidavit, again, of July 12th, 1982, you
24 stated that Dovel, Martinez, revised and checked invoices
25 and decided which were to be billed to each committee.

1
2 A That was at the March 14th meeting. You
3 know, we were two or three days away from the primary and
4 we wanted everything cleared up.

5 Q Let's discuss the March 14th meeting.

6 A Um-hum.

7 Q Who was present at that meeting?

8 A It was Miss Gomez, my production manager, Mr.
9 Luis Pena. It was Evans Dovelie, Angel Viera Martinez and
10 Virgilio Ramos and myself.

11 Q Was Masolino Blanco, the credit manager,
12 present?

13 A No.

14 Q He was not?

15 A No.

16 Q All right.

17 Was that held at your office?

18 A Held at our office.

19 Q And what day of the week was that; do you
20 recall? Is that a Saturday?

21 MS. GOMEZ: A Friday afternoon.

22
23 BY MR. WHITEHEAD: (resuming)

24 Q A Friday afternoon.

25 Can you tell us--first of all, Mr. Franco, would

1
2 you tell us what you remember by way of the discussion,
3 and I will ask you, Miss Gomez, exactly the same thing.

4 A Well, there was an argument between Dovelie
5 and Viera Martinez about the bills, because Viera Martinez
6 decided that he wanted Carter-Mondale to assume the
7 responsibility with more bills than the ones that Dovelie
8 finally accepted.

9 So, they had a discussion and the thing went
10 fifteen or twenty minutes, and Dovelie refrained from
11 accepting some of the bills.

12 Finally, he agreed on the bills that totaled
13 sixty-three thousand dollars, in our case, because there
14 was another problem. For example, telephone bills, rent and
15 other expenses that were made by the Carter Mondale Committee
16 in that particular place that I told you.

17 Q Right.

18 A Munoz Rivera Avenue.

19 So, finally we were interested that Mr. Dovelie
20 agreed to pay. So, after he agreed in a certain amount,
21 Miss Gomez issued the--made the right invoices.

22 Q Did this involve both committees?

23 A No, we are talking about Carter-Mondale.

24 In that particular moment we were concerned about
25 Carter-Mondale's responsibilities for certain expenses.

1
2 And after he agreed, we had to re-write some of
3 the bills in order to conform to the amount of money that
4 Mr. Dovellet agreed to pay.

5 And he took those bills with him because he was
6 leaving the same night for the states.

7 Q Did you then put these bills together, Miss
8 Gomez?

9 A (MsGomez) Yes.

10 Q Can you tell us about that?

11 A (Ms.Gomez) Yes. That's when he explained
12 to me that I was to put the bills in care of Mr. Lee Kling,
13 and then we typed them and he took them with him.

14 He even signed them in front of us.

15 Q All right.

16 Was there any discussion of the bills of Comite
17 Amigos at that meeting?

18 A No. No, because that particular meeting
19 was done to clear up the debts that were the responsibility
20 of Carter-Mondale.

21 Q Was there any discussion at any time
22 involving Viera Martinez and Dovellet--well, let's start
23 with Dovellet.

24 Was there any discussion with Dovellet as to
25 billings to Comite Amigos and billings to Carter-Mondale?

1
2 A Well, let me tell you.

3 The truth is that Dovellet refrained from getting
4 involved in the discussion when we were talking about the
5 Comite Amigos.

6 Q Did Viera Martinez ever discuss the billings
7 to Comite Amigos and the billings to Carter-Mondale
8 Presidential Committee?

9 A Who? Mr. Dovellet you are talking about?

10 Q No, I am talking about Mr. Viera Martinez.

11 A Oh, yes, we talked several times.

12 Q Did he tell you, Viera Martinez, or you,
13 Miss Gomez, how each committee was to be billed?

14 A Well, he never said anything because the
15 instructions were given to me in front of him, and
16 probably he assumed I had the right directions.

17 At the same time, the several times that we met
18 with Dovellet, Dovellet continued saying this belongs to
19 me, this belongs to me, you know.

20 Q I don't understand that testimony.

21 A In other words, every time we presented
22 invoices or estimates of production costs, if Dovellet was
23 present, Dovellet--you know, he is more in the conversation
24 if the billing was referring to--

25 Q Comite...?

1
2 A Comite Amigos. He was very careful. He
3 was playing his game pretty well.

4 Q Was Jurado present when you discussed these
5 separate billings with Viera Martinez?

6 A Probably one time, but not too often. He
7 was not present in that meeting of March 14th. He was
8 not present.

9 Q The total package of sixty-three thousand,
10 six hundred twenty-four dollars and fifty cents--right? That
11 was the total amount agreed upon?

12 MS. GOMEZ: Right.

13
14 BY MR. WHITEHEAD: (resuming)

15 Q Was this agreed upon after the ads were
16 run? Right?

17 This is the March--do you recall?

18 A (Ms. Gomez) No. Well, that same day we
19 were placing a lot of spots.

20 Q But you knew what you were placing?

21 A (Ms. Gomez) Oh, yes.

22 Q All right.

23 How did they designate the separation of the
24 invoices?

25 A In that meeting?

MS. CALLAHAN: Yes.

THE DEPONENT: Well, I remember that the argument was--this belongs to Comit  Amigos; this doesn't belong.

BY MR. WHITEHEAD: (resuming)

Q Who said that?

A Viera Martinez was pushing to get more money from Carter-Mondale's stateside funds, and every time he was pushing bills to Dovel .

Q And Dovel  was turning them down?

A Yes.

Q So, they were designated by separate stacks?

MS. GOMEZ: No. Sometimes--what happened was that at one moment Viera Martinez realized that the Comit  Amigos was really in debt, owed too much money, and that he don't see how Comit  Amigos could pay.

So, it reached--okay, you people have been doing a job here. You didn't send President Carter here to help out; you didn't bring the President to help us. You have to pay.

You know, it was--

BY MR. WHITEHEAD: (resuming)

Q And Dovel  would say no?

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1
2 A He would say no, we don't have funds. We
3 have to win the election in the states.

4 Q You stated in your affidavit of July 12th,
5 again, that Butch James, along with Keefe and Dovelie would
6 make contacts for our productions.

7 Was that the same as Buddy James?

8 A Buddy James, yes.

9 Q Butch James?

10 A Probably it's a mistake. It must be Buddy
11 James. Butch James is a ballplayer that lives in Puerto
12 Rico.

13 Q And your testimony was that you are not
14 familiar with Keefe?

15 A Yes, might be--may be somebody else.

16 Let me tell you, there were many people going in
17 and out.

18 Q Was Buddy James connected with Carter-
19 Mondale?

20 A Yes, he lived in Puerto Rico for those two
21 months. He started very early in Puerto Rico.

22 Q Did he know of Comite Amigos?

23 A Yes, he was very familiar with it.

24 Q How did he know that?

25 A Because he came to the office several times.

1
2 Not in the March 14th meeting, in other times
3 that Mr. Martinez came to see me.

4 Q He came with Mr. Martinez?

5 A With Buddy James.

6 Q Did he come with Jurado, Buddy James?

7 A No.

8 Q Was he familiar with the Komite Amigos' ad?

9 A Oh, yes, very familiar.

10 Q Did he look at the ad; James?

11 A No.

12 Q Was he familiar that there were separate
13 accounts?

14 A Yes, because he was in that first meeting
15 at the Speaker's House--office.

16 Q Mr. Franco, I show you what has been
17 identified as FEC Exhibit 9, which purports to be a copy
18 of a letter to Joe Franco & Associates from Evans
19 Dovelie, dated March 8th, 1980, at the bottom of the
20 letter.

21 And I am wondering if you are familiar with the
22 original of that letter?

23 (Above-mentioned document
24 marked as Exhibit No. 9)
25

1
2 MR. FRANCO: I believe that March 8th must
3 be a Saturday; was it?
4

5 BY MR. WHITEHEAD: (resuming)

6 Q Are you familiar with that letter?

7 A Yes, I am familiar with the letter, but I
8 want to--

9 MS. CALLAHAN: It was a Monday.

10 MR. FRANCO: And we have the 1980--

11 MS. CALLAHAN: Oh, I am sorry.

12 MR. FRANCO: Well, the 16th was--when was
13 the primary? It was a Sunday.

14 MS. GOMEZ: A Sunday, March 16th, right.

15 BY MR. WHITEHEAD: (resuming)

16 Q The 16th would be a Saturday--okay.

17 A This has to do with this particular spot
18 that we have been talking about in which the governor
19 of Puerto Rico is making an appearance at the very end and
20 says vote for Jimmy Carter.

21 Okay. This was the authorization that he made
22 to purchase television spots, not including the production.
23 That's why our bills add to twenty-seven thousand dollars.

24 Is that true?
25



1
2 MS. GOMEZ: Yes.

3 MR. FRANCO: Because production is not
4 involved.

5 This is Mr. Dovel's authorization to
6 place twenty-five thousand for that particular
7 spot.

8 Okay. Now, this letter, as you see it's
9 very strict, because Mr. Dovel don't make any
10 reference to expenditures before this particular
11 assignment of a spot because he is talking after
12 March 8th, see?

13 But before that there were a lot of expenses
14 that were supposed to run against the Carter-Mondale
15 Committee, authorized by Mr. Viera Martinez, who
16 happened to be the chairman of the Carter-Mondale
17 Committee in Puerto Rico.

18 So, this particular letter is the authorization
19 for that spot.

20 BY MR. WHITEHEAD: (resuming)

21 Q Did you receive that letter through the mail?

22 A No, he signed it in front of me.

23 Q In your office?

24 A In my office.
25

8404 048 2404

1
2 Q Were you present, Miss Gomez?

3 A (Ms.Gomez) No.

4 Q All right.

5 Who else was present? Anyone else present?

6 A (Ms.Gomez) Luis Pena.

7 MR. FRANCO: I think this morning he came
8 to--remember that I told you that he called me
9 from the governor's home.

10 BY MR. WHITEHEAD: (resuming)

11 Q Right.

12 A He came to see me and to give me an
13 additional instruction, and then he came up with this
14 letter.

15 Q Did he write that in your office?

16 A Yes.

17 Q Is that your stationery?

18 A What?

19 Q Is that your stationery?

20 A I don't know.

21 Q Where did you get the paper?

22 A Probably I handed him the paper, but, you
23 know, after reading the letter now, you know, he--it is
24 a well-written letter, you know.
25

1
2 He avoided the commitment, the previous commitment,
3 but that is the authorization.

4 How much is the billing for that?

5 MS. GOMEZ: Twenty-seven thousand.

6 MR. FRANCO: Twenty-seven thousand.

7 You see, production is not there.

8
9 BY MR. WHITEHEAD: (resuming)

10 Q All right.

11 In his last sentence--

12 A Yes.

13 Q --he says--the paragraph, itself, reads:

14 "This will represent the solely authorized
15 purchase of any media by the official committee
16 to re-elect the president.

17 A letter has been sent last month disavowing
18 any connection of an organization called Amigos
19 de Jimmy Carter with us, and I bring this to your
20 attention so that you may advise--so that you may
21 so advise any of your vendors or to answer any
22 press inquiries."

23 The substance of that paragraph, was that discussed
24 between yourself and Mr. Dovellet?

25 A No, I believe that what Mr. Dovellet was

1 trying to point out in that moment was his argument--his
2 discussions that he was having with Mr. Viera Martinez;
3 that Mr. Viera Martinez wanted to force these people to
4 pay previous bills that were put on behalf of Carter-Mondale
5 and they wanted to avoid.

6 Because, see here, Mr. Dovelie entered into a
7 confusion because he wrote to us April 24th, 1980--I have
8 in hand your letter of April 18th, 1980, with every
9 documentation and witnesses available. I authorize
10 thirty thousand, zero ten in expenditures on behalf of the
11 Carter-Mondale Committee. Enclosed.

12 Q Why don't I--

13 A He talks about thirty thousand. I received
14 the invoice, not validated by me, and, in fact, enforced
15 before I ever came to Puerto Rico.

16 See, in other words he was trying not to be
17 responsible of anything that was before he came to Puerto
18 Rico.

19 MR. WHITEHEAD: Mark this as Exhibit 10.

20 (Above-mentioned document

21 marked as Exhibit No. 10.)

22 BY MR. WHITEHEAD: (resuming)

23 Q Mr. Franco, I show you what has been marked
24 as FEC Exhibit 10.
25

1

2

A Yes.

3

4

5

Q Which purports to be a copy of a letter signed by Evans Dovelie, dated April 24th, 1980, addressed to Joe Franco & Associates.

6

7

And I ask you if you are familiar with this particular letter?

8

A Yes, sir.

9

I am familiar with that letter.

10

11

Q Is that the letter you were just referring to in your testimony?

12

A It is the same one.

13

14

Q So that what you read into the record happens to be the second paragraph of that letter?

15

A Right.

16

Q All right.

17

A So, then--

18

19

20

Q Going back to his letter of March 8th, 1980, he talks in terms of advice to vendors or answering press inquiries.

21

22

Did you ever get any press inquiries? Did you ever discuss press inquiries with him?

23

24

25

A Yes, because in those days, you know, the press people, the media starts wondering why are they spending so much money. There was actually a hell of a

1 campaign in all the networks, in the t.v. stations.

2
3 Sometimes in the night you were watching ten
4 spots for Kennedy and ten spots for Carter. There was a
5 tremendous--it was very unusual, you know,

6 The thing was that the campaigns were concentrated
7 mostly in the--two weeks before the primary. That's what
8 happened; so many spots running at the same time.

9 So, the press gets worried, you know, suspicious:
10 where are these people getting that much money? You know,
11 so--and the press came to me, you know, who paid you?

12 So, I had to be careful. And one day he was in
13 my office and he saw that some guy from the San Juan Star,
14 a reporter came to see me, and he was there. And he said,
15 you'd better be careful with what you say. I didn't say
16 anything.

17 So, then he wrote again in that paper that thing,
18 because he was very concerned that they don't tie up one
19 thing with the other.

20 Q Just one final question, I do believe.

21 Does the Comite Amigos debt still stand at a
22 hundred twenty-four thousand, eight hundred fifty-eight
23 dollars and thirty-seven cents?

24 MS. GOMEZ: Yes, sir.
25

1
2 BY MR. WHITEHEAD: (resuming)

3 Q Yes, it does?

4 A Yes.

5 Q Why did you file suit against Carter-Mondale
6 and not against Comité Amigos when the debt of Comité
7 Amigos is at least three times as large as the Carter-Mondale
8 debt?

9 A Because since I know what was the set-up,
10 and after getting legal counseling, we knew that we don't
11 have where to go if we sue the local people.

12 So, the only way that we can collect money from
13 Carter-Mondale, the twenty-four thousand that **they owe**, and
14 we have been working with this debt of Comité Amigos about
15 what Mr. Viera Martinez can do for us in the future; he
16 can realize any sort of activity or--and he comes up with
17 not all, but part of that amount of money.

18 Q Okay.

19 MR. WHITEHEAD: I think we have pretty well
20 exhausted these two witnesses.

21 MR. RODRIGUEZ: On the record, let me add
22 that--

23 MR. WHITEHEAD: Off the record?

24 MR. RODRIGUEZ: Off the record.

25 (Deposition terminated, witnesses excused.)


REPORTER'S CERTIFICATION

I, OLIVIA D. GITTENS, court reporter, do hereby
certify:

That I, acting as shorthand reporter, reported
the aforementioned proceedings by machine shorthand to the
best of my knowledge and ability, and that I thereafter
caused the same to be reduced to typewriting under my
direction as hereinbefore set forth:

That the foregoing pages are a full, true and
correct record of the proceedings in the aforementioned
matter:

That I am not of counsel or attorney for either
or any of the parties to said matter, nor interested in
any way in the outcome of the cause named in said caption.


Olivia D. Gittens

April 24, 1980

Joe Franco and Associates
1120 Ashford Avenue
San Juan, Puerto Rico 00907

Dear Joe,

I have in hand your letter of April 18, 1980.

With every deference, and documentation and witnesses available, I authorized \$30,010 in expenditures in behalf of the Carter/Mondale Presidential Committee (enclosed).

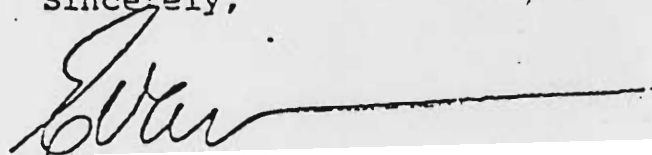
I received your additional invoices not validated by me and in fact in force before I ever came to Puerto Rico, for the sake of bringing them to the attention of Angel Viera Martinez and Donna Sagemiller.

I apologize for the inability to reach me personally due to my extensive travel and I hope this letter finds you and your colleagues well.

I appreciate the kindness and professionalism extended to me during my stay on the Island.

My very best wishes.

Sincerely,



Evan S. Dobelle
National Finance Chairman

ENCLOSURE IV

TO: Joe Franco and Associates, Inc. ^{subsidiary}
FROM: Evan S. Dohelle ^{Phony}

You are hereby authorized on behalf of the Carter - Mondale Presidential Committee, Inc - S. Lee Kling Treasurer to purchase \$25,000 of television spots on behalf of our National Committee, plus production.

This will represent the solely authorized purchase of any media by the official committee to re-elect the President. A letter has been sent last month disavowing any connection of an organization called "Amigos de Jimmy Carter" with us, and I bring this to your attention so you may so advise any of our vendors or to answer any press inquiries.

Evan Dohelle
Nat. Finance Club
3/8/80

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CARTER MONDALE COMMITTEE
C/O SR. ANGEL VIERA
SAN JUAN, P.R.

INVOICE NO. 80-1-18 P

DATE: 1/31/80

TEMPO CREATIVE SERVICES, INC. (Factura 80-1-26)
Por arte e impresión de 3,000 hojas para cubiertas
de alcancía Radio Maratón...

\$ 136.00

TEMPO SOUND STUDIOS (Factura 80-1-125)
Por tiempo de grabación, mezcla y master
de cña Radio Maratón Carter-Mondale.

180.00

TEMPO SOUND STUDIOS (Factura 80-1-124)
Por grabación de cña de 30 segundos,
estudio, 8 cartridges y 40-8 track cartridges.

560.00

TOTAL \$ 876.00

IRMA M. GONZALEZ

34040482414

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CARTER MONDALE COMMITTEE
C/O LCDO. ANGEL VIERA MARTINEZ
SAN JUAN, P.R.

INVOICE NO. 80-2-19 P

DATE: Feb. 28, 1980

CONVOCATORIA A DEMOCRATAS CON JIMMY CARTER

EL HUEVO DIA (Factura 020039)

Por concepto de 1 anuncio de 30
pulgadas publicado en feb. 2, 1980.

\$ 510.00

EL VOCERO (Factura 41566)

Por concepto de 1 anuncio de 30
pulgadas publicado en feb. 1, 1980.

450.00

THE SAN JUAN STAR (Factura 056198)

Por concepto de 1 anuncio de 30
pulgadas publicado en feb. 1, 1980.
("Invitation to all Democrats...")

420.00

NATIONAL TYPESETTING SERVICES

Por concepto de tipografía para
anuncio de prensa publicado en
El Nuevo Día, El Vocero y The San
Juan Star en feb. 1,2, 1980.

20.00

TEMPO CREATIVE SERVICES, INC. (Fact. 80-2-57)

Por concepto de arte y 3 negativos
línea de 30 pulgadas para anuncio
de prensa publicado en El Nuevo Día,
El Vocero y The San Juan Star en feb.
1,2, 1980.

250.00

TOTAL

\$ 1,650.00

YANA M. GOMEZ

01040482416



Suz Mink of Roanoke, Va. leaves the Yorktown dock with the Olympic torch flaming brightly as she and 51 other American runners bear the torch to Lake Placid, N.Y. for the 1980 Winter Olympics. (UPI photo)

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Boxer Jones booked for rape

Boxer Fred Too Tall Jones, who quit the Dallas Cowboys to become a heavyweight boxer, Thursday was arrested and arraigned for the rape of a woman.

Jones, 28, was arrested at his home in Dallas, Texas, by five police officers. The woman was taken to a hospital about 10 miles from Jones' home. He was taken to a hospital before Judge J. Lee Smith and released on \$10,000 bail about 10 a.m.

As he was leaving the jail with Dallas Attorney Fred T. Jones, quoted reporters as saying, "I'm sorry. No woman."

According to the report, the woman, a 25-year-old nurse, told police Jones was 255 pounds and weighed 255 pounds after playing football at the University of Texas.



FRED TOO TALL JONES

ANDRES FERNANDEZ & CO.

El Zippede Restaurant

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OUR SPECIALTY

• Cuban Food
• Puerto Rican Food
• Mexican Food

El Zippede Restaurant

164 9570

she was sleeping. Jones, his woman friend, her roommate and a doctor friend of Jones went to a disco restaurant to celebrate the doctor's birthday. After the doctor went home about 1 a.m., Jones went with the women to their apartment. The roommate said she soon went to bed.

The report said about 2 a.m. the woman was awakened by a body on top of her and was being raped. When she awoke Jones left the room and she went to a friend's house to call police.

When the officers went to the apartment, Jones' woman friend met them at the door.

let them in and led officers to her bedroom where Jones was asleep. She said he had left her room twice during the night but she did not know where he went. The police report said.

Jones retired from the Cowboys after the 1978 season to become a heavyweight boxer and has won his first six fights.

Jones, 28, was the Cowboys' No. 1 draft choice in 1974 after completing his career at Tennessee State where he was a two-time small college All-American selection.

After the 1978 season, considered his best with the Cow-

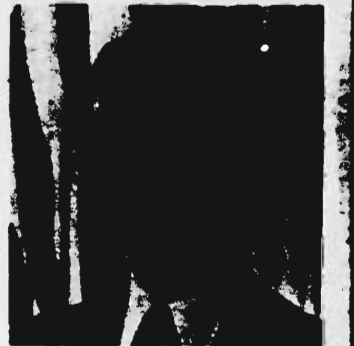
boys, he became a free agent but never received a sufficient offer from another team. Instead of returning to the Cowboys, Jones, a native of Jackson, Tenn., said he was quitting football to try boxing.

Ever since leaving the Cowboys there has been speculation that Jones missed football and would return to the team. Last week he was forced to deny a report he would quit the ring and rejoin the Cowboys in mid-February.

Jones, who also operates Tall's Inc., an entertainment booking agency, had his first fight in Las Cruces, N.M., against Yanqui Maneses in November.

INVITATION TO ALL DEMOCRATS WHO ENDORSE JIMMY CARTER FOR RE-ELECTION

By means of this notice we invite all Democrats to a Congressional District Caucus to select the candidates for delegates who will appear on the ballot committed to support Jimmy Carter for re-election in the Democratic Presidential Primaries to be held in Puerto Rico March 16, 1980.



DATE	TIME	CONGRESSIONAL DISTRICT
February 10	11:00 A.M.	San Juan-Sixto Escobar Stadium
February 10	11:00 A.M.	Bayamon-Cancha Papin Castero, Betances St., Urb. Hermanas Davila Bayamon
February 10	11:00 A.M.	Arecibo-Coliseo Municipal
February 10	11:00 A.M.	Maguey Aguedilla Coliseo Municipal de Aguedilla
February 10	11:00 A.M.	Ponce-Coliseo Municipal Next to Paguito Montaner Stadium
February 10	11:00 A.M.	Guayama-Purificacion Rodriguez School Rodriguez Hidalgo Street, Coamo
February 10	11:00 A.M.	Humacao-Nueva Cancha Bajo Techo de Rio Grande
February 10	11:00 A.M.	Carolina-Coliseo de Guaynabo

The above listed locations for these meetings will be open from 8:00 a.m. on Sunday, February 10, 1980 until 11:00 a.m. so that all eligible Democrats can participate. Immediately after 11:00 a.m. the voting process will begin to elect the delegates whose names will appear on the ballot on March 16, 1980 committed to the re-election of President Jimmy Carter.

The delegates will be chosen from among candidates who have filed their names with the New Democratic Party prior to January 31, 1980.

ANGEL VIERA MARTINEZ
Campaign Coordinator Carter Mondale Committee

RE-ELECT PRESIDENT CARTER

This time Bowie was there

By Red Smith

New York Times News Service

NEW YORK — Some might think that if 9:07 p.m. on April 8, 1974, was baseball's outstanding moment of the decade, then the commissioner of baseball should have been among the 53,775 assembled in Atlanta.

However, the commissioner of baseball is a busy man with weighty responsibilities. On the night Henry Aaron hit his 714th home run and broke Babe Ruth's career record, Bowie Kuhn had to be up in Ohio talking to the Cleveland Sports Fan Club. And anyway, Bowie had seen Hank hit No. 714 and, as Ronald Reagan says about redwood trees, when you've seen one you've seen them all.



SMITH

Furthermore, Bowie was not enormously popular in Atlanta just then. When the 1974 season started, Aaron had 713 home runs. Bill Bartholomew, the Braves' owner, had announced that Hank would be held out of the opening series in Cincinnati so he could try and break Ruth's record in Atlanta and make a lot of money for the club.

Kuhn had properly voiced this contrived box-office hype, on his orders, Aaron played in Cincinnati, hit No. 714 with his first swing, and Atlanta restorers were deprived of the chance to see Ruth tied.

There were banners in the park when the Braves opened at home: "Did King Kuhn Okay the Leap?" one asked. Another urged, "Send Kuhn to the Moon."

The moment that Baseball Magazine has chosen as the game's greatest in the 1970s came on Aaron's first time at bat. Al Downing of the Dodgers threw a fast ball and Henry pruned it over the left field fence. As he circled the bases, his playmates met him at the plate and lifted him high. But he broke free and trotted to a box beside the Braves' dugout to embrace his wife Billye and his parents, Mr. and Mrs. Herbert Aaron of Mobile.

Monte Irvin then presented a \$3,000 diamond-encrusted wrist-watch to Aaron. Because he represented the commissioner's office, Monte was holed Kuhn would have been holed harder. Bowie wouldn't enjoy that.

Almost six years went by before Aaron commented on Kuhn's absence from that historic scene. Hank was supposed to attend a luncheon here in Gallagher's the other day and Kuhn was going to present an award from Baseball Magazine as a memento of the game's great moment.

Instead of showing up, Aaron sent a telegram recalling that when he broke Ruth's record "the commissioner did not see the need to attend."

It was a public rebuke to the commissioner in retaliation for a hurt that had rankled for a long, long time. A deserved rebuke? Well, when the game experiences its greatest moment in 10 years, chances are the game's front man ought to be on hand, even if he couldn't be dead sure when the moment would occur. Maybe Bowie should have sent Monte Irvin to talk to those fans in Cleveland and come to Atlanta himself. As it is with most public performers, there is more than a

touch of ham in most ballplayers, and most commissioners. From the moment a kid first dreams of playing before cheering crowds, fame is the spur. If Aaron has sometimes seemed touchier than some others, quicker to take offense at what seems to him a slight, the reason isn't hard to find.

For 15 years he was hardly ever out of the lineup, whacking 40, 44, 47 homeruns and scoring more than 100 runs year after year, stealing bases, playing a solid game in the outfield and filling in if needed at first, second or third base.

He was building up records that no one in his lifetime would threaten, maybe no one in this century, yet he never heard the acclaim that was showered on contemporaries like Willie Mays, Mickey Mantle, Ted Williams and Stan Musial. For about one week at the start of one season, he enjoyed about the same attention that Roger Maris attracted for a whole season.

"I see pictures of Mays and Mantle here," he growled one day. "But not of me." He was looking at a pamphlet distributed by the Hall of Fame. Neither Mays or Mantle had made it to Cooperstown then, but both were clearly on their way. So was Henry, of course. He'll breeze in during the winter of 1981-82, when he becomes eligible.

The word got around that he felt he had been snubbed by the Hall of Fame. Then when he hit No. 715, there was some flack because he didn't send the bat and ball to Cooperstown immediately. He had a contract to let them be exhibited in promotions by the Magnavox company. As soon as that was over, he brought the sacred relics to Cooperstown in person.

The wire read at Gallagher's also mentioned Aaron's feeling that baseball should hire more blacks in front-office jobs and as managers. This is not a new attitude on his part. In 1974 the Braves' manager, Eddie Mathews, was fired and Aaron was mentioned as a logical successor, even though he had repeatedly disclaimed any ambitions in that direction.

Now he said: "If they offered me the job I'd be almost compelled to take it simply because there are no black managers in the majors."

This made it tough for Eddie Robinson, the Atlanta general manager, who hastily announced that he was already committed to Clyde King, Aaron is now the Braves' vice president and director of player development.

The fact that the Braves didn't offer him Mathews's job begged him for a time, not because of himself but because of his color. Two months later when Cleveland made Frank Robinson the first black manager, Aaron told reporters: "My heart is still thumping. I think I'll go out and celebrate."

One thing must be said about Henry, a snub may upset him but pressure doesn't. He waited out the fall and winter of 1973-74 aware that Ruth's record was only one swing away. The ballplayer's reverence for records borders on pagan idol worship.

When Maris was chasing Ruth's one-season record of 60 homeruns, the pressure was such that his hair came out in patches. After six months of waiting and thinking, Aaron came to opening day with the eyes of the nation on him. One homerun would be the record, two would break it. Henry's first three hits were homeruns.



University of South Carolina basketball coach Frank McGuire, center, is honored by Madison Square Garden president Sonny Werblin, left, and St. John's basketball coach Lou Carnesecca as he is honored during halftime of

a recent game. After 42 years of coaching, the last 16 with South Carolina, McGuire is retiring after this season (UPI Photo)

Moret signs Cleveland contract

Rogelio Moret, left-handed pitcher for the San Antonio Crabs, has signed a two-year contract with the Cleveland Indians, Crabs president Reinaldo Paniagua announced Thursday.

He did not reveal terms of the contract.

Moret, who had a 7-3 record with an 1.86 ERA in 82 1/2 innings with the Crabs, will report to the Indians' training camp in Tucson, Ariz., March, Paniagua said.

The southpaw's contract signals a dramatic reverse in

his fortunes since he lapsed into an apparent catatonic state while pitching for the Texas Rangers two years ago. Moret was paralyzed for an hour and it looked like his career was finished.

But Moret did no well this winter. That various teams in the majors became interested in hiring him, Paniagua said.

Paniagua said Indian president Gabe Paul and General Manager Phil Niekro came to San Juan twice to watch Moret play.

Hermosillo to start Niemman vs. D.R.

MEXICO (UPI) — The Hermosillo rangers, hoping to repeat their Caribbean Series triumph of four years ago, have announced they will start left-hander Randy Niemman against Best Lory when the series opens Sunday in the Dominican Republic.

Hermosillo manager Benja-

min Reyes added that in the second game he will start Roberto Castillo and go with Maximino Leon in the third game.

The team was scheduled to leave Thursday for Santo Domingo where it will also clash with Bayamon of Puerto Rico and Caracas of Venezuela.

Ortega sinks 13 as West stars win

Anita Ortega of Puerto Rico netted 13 points to help the West post a 115-112 victory over the East in the second annual Women's Pro Basketball League all-star game Wednesday night in Chicago.

Ortega, the first island

woman to break into the pro ranks, scored three goals and hit seven out of 10 from the line.

Melba Balla and Alfredo Abernathy topped the West scorers with 25 and 23 points, respectively.

Pee Wee gridders play Saturday

The Steelers will try to improve their record to 2-0 in Division AA play Saturday when they face the Steelers (0-1) at 8:30 a.m. Ft. Buchanan's Mani Williams led at the Pee Wee Football league rolls into its second week of action.

All told, there will be 20 games in four divisions. Games are slated to start at 8:30 a.m. and 10:45 a.m. except for Division C which has games set for 8:30 a.m., 10:15 a.m. and 1 p.m.

Admittance is free.

VITA friction reports denied

Special to the STAR

ST THOMAS — Scoffing at published reports that friction within the Virgin Islands Tennis Association led to his resignation as president and executive director last week, Hans Eisler said Thursday the reasons were "purely financial—the bones of bare necessity."

Eisler elected to his fourth one-year term as president of the territory's governing body of tennis just two months ago said the \$500 monthly salary for his dual role as executive director could not sustain his income needs since it occupied his time seven days a week. "I plan to devote most of my time now to my charter boat business, although I'll remain a board member of VITA as any

past president would," Eisler stated.

Reports that one major tennis resort had withheld paying fees to VITA following major tournaments and the resulting inability to pay Eisler's salary the past four months were confirmed by Eisler but he maintained he still would have been unable to continue at the present salary level.

However, former board member Sandy Keiman of Pineapple Beach said "we can't afford an executive director. It's too ambitious a step at this time and we need the money more for the development of junior players. A part time secretary should be hired with the rest of the work done on a volunteer basis."

Several little leagues to begin play

The Summit Hills Altamira Community Association opens curtains for its 16th annual little league season with a special pre-league ceremony to night at Summit Hills Park.

State and municipality officials will be on hand for activities slated to start at 7:30 p.m.

Parading the field during ceremonies will be all the youngsters ready to be active in five different age categories.

Castellana Gardens announced its little league season will begin Saturday with 15 teams in four categories participating.

The Boringen Gardens Recreational Park is the stage for that community's inauguration Feb. 9.

More than 150 boys between five and eleven years old will participate in Boringen Gardens' three categories.

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-2-43 P

CARTER MONDALE COMMITTEE

BOX 2489

SAN JUAN, P.R. 00963

DATE: Feb. 29, 1980

PROMOCION CAUCUS DEMOCRATAS EN 2/10/80

RADIO

WKAQ RADIO (Fact. 2155-03)

Por concepto de 16 cuñas de Radio de
30 segundos transmitidas en Radio Reloj
AM en feb. 6 al 9, 1980. (48 cuñas bono)

\$ 976.00

WKAQ RADIO (Fact. 2156-04)

Por concepto de 4 cuñas de Radio de 30
segundos transmitidas en Radio Reloj
AM en feb. 6 al 9, 1980. (12 cuñas bono)

244.00

WKAQ RADIO (Fact. 2154-04)

Por concepto de 4 cuñas de Radio de 30
segundos transmitidas en Radio Reloj AM
en feb. 6 al 9, 1980.

244.00

WKAQ RADIO (Fact. 2153-04)

Por concepto de 4 cuñas de Radio de 30
segundos transmitidas en Radio Reloj AM
en feb. 6 al 9, 1980.

244.00

WLEO RADIO (Fact. 02-0019)

Por concepto de 40 cuñas de Radio de 30
segundos transmitidas en feb. 6 al 9,
1980.

200.00

WPRP-PONCE (Fact. 2-5)

Por concepto de 40 cuñas de Radio de 30
segundos transmitidas en feb. 6 al 9,
1980 a \$5.50 c/u.

220.00

WEUC-PONCE (Fact. 3533)

Por concepto de 40 cuñas de Radio de 30
segundos transmitidas en feb. 6 al 9,
1980 a \$4.40 c/u.

176.00

34040432413

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1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

CARTER MONDALE COMMITTEE

INVOICE NO. 80-2-43 P

DATE:

- 2 -

WAEI-MAYAGUEZ (Fact. 22357)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$4.50.

\$ 180.00

WORA-MAYAGUEZ (Fact. 2-21)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$7.00 c/u.

280.00

WUNA-AGUADILLA (Fact. 2-F)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$3.50 c/u.

140.00

WMIA-ARECIBO (Fact. 80-124)

Por concepto de 51 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$1.70 c/u.

120.00

WCMN-ARECIBO (Fact. 41639)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$4.00 c/u.

160.00

WEGA-VEGA BAJA (Fact. 4755)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980.

150.00

WALO-HUACAO (Fact. 80-2111)

Por concepto de 40 cuñas de Radio de 30 segundos transmitidas en feb. 6 al 9, 1980 a \$5.00 c/u.

200.00

WNEI-CAGUAS (Fact. 1185)

Por concepto de 40 cuñas de Radio de 30

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1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-2-43 P

CARTER MONDALE COMMITTEE

DATE:

- 3 -

segundos transmitidas en feb. 6 al 9,
1980 a \$600 c/u.

\$ 240.00

WXRF-GUAYANA (Fact. 80-2-113)
Por concepto de 30 cuñas de Radio de 30
segundos transmitidas en feb. 7 al 9,
1980.

180.00

Total Radio \$ 3,954.00

PRODUCCION RADIO

HECTOR TRAVIESO/LOCUTOR

Por locución en 9 cuñas de 30 segundos.
Package.

450.00

RAUL ROSADO/LOCUTOR

Por locución en 9 cuñas de 30 segundos.
Package.

450.00

TEMPO SOUND (Fact. 80-1-16, 21, 23)

Por concepto de grabación en estudio,
mixing y 16 cartridges.

570.00

Total Prod. 1,470.00

PRENSA

EL NUEVO DIA (Fact. 020331)

Por concepto de 1 anuncio de 30 pulgadas
publicado en feb. 7 y 8, 1980. (Este
próximo domingo...)

1,020.00

EL VOCERO (Fact. 41709)

Por concepto de 1 anuncio de 30 pulgadas
publicado en feb. 7 y 8, 1980. (Este
próximo domingo...)

900.00

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO

INVOICE NO. 80-2-43 P

CARTER MONDALE COMMITTEE

DATE:

- 4 -

THE SAN JUAN STAR (Fact. 065105)

Por concepto de 1 anuncio de 30 pulgadas
publicado en feb. 9, 1980.

\$ 420.00

Total Prensa \$ 2,340.00

PRODUCCION PRENSA

NATIONAL TYPESETTING SERVICES

Por tipografía para anuncio de prensa
publicado en feb. 7,8,9, 1980 en El
Nuevo Día, El Vocero y The San Juan Star.

25.00

TEMPO CREATIVE SERVICES (Fact. 80-2-55, 61)

Por concepto de arte y 2 negativos línea
para anuncio de prensa de 30 pulgadas pu-
blicado en 3 periódicos en español e inglés,
en feb. 7,8,9, 1980.

332.00

Total Prod. 357.00

TOTAL \$ 8,121.00

IRMA M. GOMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-2-44 P

CARTER MONDALE COMMITTEE
BOX 2483
SAN JUAN, P.R. 00963

DATE: Feb. 29, 1980

INAUGURACION OFICINAS CENTRALES COMITE CARTER-MONDALE

RADIO

WUNO RADIO (Fact. 66)

Por concepto de transmisión de remoto
de 3 1/2 horas de duración en feb. 9/80. \$ 1,225.00

WXRF RADIO (Fact. 223467)

Por concepto de 3 1/2 horas de trans-
misión en feb. 9/80. 450.00

WALO RADIO-HUMACAO (Fact. 2-80-305)

Por concepto de 3 horas de transmisión
en feb. 9, 1980. 300.00

WTIL-MAYAGUEZ (Fact. 2-9-80)

Por concepto de 2 horas de transmisión
en feb. 9, 1980. 255.00

WCMH-ARECIBO (Fact. 41650)

Por concepto de 3 horas de transmisión
en feb. 9, 1980. 360.00

WNEL-CAGUAS (Fact. 1184)

Por concepto de 3 horas transmisión en
feb. 9/80. 450.00

WUPR-UTUADO (Fact. 80-2-120 (2))

Por concepto de 3 1/2 horas de transmi-
sión en feb. 9/80. 360.00

WZAR-PONCE (Fact. 2-83)

Por concepto de 3 1/2 horas de transmi-
sión en feb. 9/80. 750.00

WLEO-PONCE (Fact. 2-0069)

Por concepto de 3 1/2 horas de transmi-
sión en feb. 9/80. 450.00

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-2-44 P

CARTER MONDALE COMMITTEE

DATE:

- 2 -

WKAQ RADIO (Fact. 2211-01)

Por concepto de 20 cuñas de Radio de 30 segundos transmitidas local y sábado en feb. 8,9, 1980.

\$ 360.00

WUHO RADIO (Fact. 66)

Por concepto de 20 cuñas de Radio de 30 segundos transmitidas durante el día en feb. 8,9, 1980.

360.00

Total Radio \$ 5,320.00

PRENSA

EL NUEVO DIA (Fact. 020327)

Por concepto de 1 anuncio de 30 pulgadas publicado en feb. 9, 1980. (Hoy sábado)

510.00

NATIONAL TYPESETTING SERVICES

Por concepto de tipografía para anuncio de prensa publicado en El Nuevo Día en feb. 9, 1980.

15.00

TEMPO CREATIVE SERVICES (Fact. 80-2-54)

Por concepto de arte y 1 negativo línea de 30 pulgadas para anuncio de prensa publicado en feb. 9, 1980 en El Nuevo Día.

166.00

IMPRESOS

TEMPO CREATIVE SERVICES (Fact. 80-2-134)

Por concepto impresión y arte para 1,000 papel carta y 1,000 sobres.

110.00

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-2-44 P

CARTER MONDALE COMMITTEE

DATE:

- 3 -

MISCELANEOS

MFN STATIONERY

Por 7 numeradoras para enumerar sobres
y 6 pads de tinta.

\$ 285.50

ALMACENES RIGUAL

Por 4 doz. sombreros Pra-Pra.

36.00

Total Prensa,
Impresos y
Misc.

\$ 1,122.50

TOTAL \$ 6,442.50

IRMA M. GOMEZ

[illegible]

Durante su ponencia, Rodríguez Morales insistió en que la creación de la Administración para el Fomento de las Artes y la Cultura, si se aprueba tal y como se ha presentado, significaría la eliminación automática del Instituto de Cultura.

El director del ICP, mostró a la Comisión distintas partes del proyecto 1255, que lleva la firma del representante Angel Viera Martínez. En las partes señaladas por Rodríguez Morales, el proyecto estipula claramente que la nueva administración se haría cargo de muchas funciones y poderes que ahora tiene el Instituto.

Hoy Sábado
Inauguración
Oficinas Centrales del
CARTER-MONDALE
PRESIDENTIAL COMMITTEE



**Avenida
Muñoz Rivera
#50 Hato Rey**

(Antiguo Local Ochoa Fertilizer



OPEN HOUSE DESDE LAS 2:00 P.M.

¡Todos los Demócratas con Carter están invitados

Estará presente Hugh Carter en representación del Presidente

- Por Radio desde las 4:00 P.M.

WUNO-San Juan

WNEL-Caguas

WTIL-Mayaguez

WALO-Humacao

WLEO-Ponce

WXRF-Guayama

WUPR-Utuado

WCMN-Arecibo

WZAR/FM-Ponce

CARTER-MONDALE PRESIDENTIAL COMMITTEE

A copy of our report is filed with the Federal Election Commission and is available for purchase from the Federal Election Commission, Washington, D.C.

Abstract

Inquietud en Bonn por la crítica soviética

Antes que los barroos ataquen, atáquelos usted con este limpiador suave y medicado

Su acción mantiene los poros mas claros y mas limpios. Así su cutis luce mucho mejor

Su acción mantiene los poros mas claros y mas limpios. Así su cutis luce mucho mejor

Si usted está en la edad del acné sabe que los barroos pueden aparecer en cualquier momento. Por eso es conveniente que use Pimplet Scrub en el cuidado diario de su cutis.

Este limpiador facial, medicado y

Abrir la tapa y

Walgreens

suave, ayuda a secar el exceso de grasa que puede atrapar suciedad y producir espinillas y barroos. En realidad ayuda a secar los barroos mientras actúa para mantener los poros despejados y mas limpios.

Antes que los barroos ataquen, atáquelos usted con Pimplet Scrub. Esta a la venta en tiendas y farmacias. Úsela solo como se indica.

Esmalte de uñas especial ayuda a evitar que las uñas se abran o partan

Contiene protectores acrílicos y acondicionadores proteínicos

Ahora hay un esmalte de uñas que es más que un colorido circular de uñas aburridas o partidas. BELLE DE NUIT es un protector de uñas. Contiene acondicionadores para mejorar la apariencia de sus uñas. Contiene esencia de perla en una fórmula moderna de protectores acrílicos y acondicionadores proteínicos.

BELLE DE NUIT es como un tratamiento

embellecedor completo que ayuda a proteger y fortalecer sus uñas a la vez que ayuda a prevenir que se abran o partan. Les permite crecer las más largas, también.

BELLE DE NUIT viene en 14 colores de alta moda, incluyendo plata pura y de 24 quilates. Adquiesca en su farmacia o supermercado favorito.

Abrir la tapa y

Walgreens



Estado Libre Asociado de Puerto Rico
GOBIERNO MUNICIPAL
Ciales, Puerto Rico 00638

OFICINA DEL ALCALDE

AVISO DE SUBASTA

La Junta de Subasta del Municipio de Ciales, Puerto Rico, recibirá proposiciones en pliegos cerrados hasta el día 20 de febrero de 1980, a las 10:00 A.M., cuando serán abiertos públicamente para la adjudicación de la siguiente subasta:

Un camión de volteo

- Modelo 1980
- Motor Diesel
- Capacidad de 5 yardas cúbicas
- 27,000 libras de peso bruto
- Eje delantero 9,000 libras
- Eje trasero 18,000 libras
- 5 velocidades reforzado
- Rotulado

La Junta de Subastas del Municipio de Ciales, se reserva el derecho de rechazar cualquier proposición que considere inapropiada para los mejores intereses del Municipio.

Los pliegos de especificaciones deben ser solicitados en la Casa Alcaldía.

Las proposiciones deberán venir acompañadas de una fianza del 5% de la licitación.

Dado hoy 4 de febrero de 1980, en Ciales, Puerto Rico.

JOSE VILLANUEVA SAN MIGUEL
Alcalde

BONN (EFE) — Las recientes críticas soviéticas a la política alemana en Berlín suscitaron inquietud en los sectores oficiales de Bonn interesados en que no se altere el clima de normalidad en la antigua conflictiva ciudad.

Con el teo de fondo de la crisis desatada por la intervención militar soviética en Afganistán, el embajador de la URSS en la República Democrática Alemana, Piotr Abrassimov, aludó veladamente a un posible endurecimiento de la política del Kremlin en torno a Berlín.

En una entrevista difundida por la televisión de la República Federal, Abrassimov acusó al gobierno de Bonn de interpretar a su conveniencia el tratado cuatripartito que regula el vidrioso funcionamiento legal de la antigua capital alemana.

Las autoridades alemanas occidentales se apresuraron ayer a rebatir los reproches del veterano diplomático soviético, negociador del acuerdo berlines conjuntamente con las potencias occidentales ocupantes (Estados Unidos, Francia y Gran Bretaña).

Con un "estamos interesados en que siga la calma política en Berlín", el portavoz del gobierno federal, Klaus Boelling, evidenció la postura contemporizadora de las esferas oficiales germanas ante el intento de presión soviética.

Con suma atención se registraron también aquí las palabras de Abrassimov en el sentido de que podría interrumpirse la retirada de tropas soviéticas de Alemania comunista en el caso de "nuevas acciones occidentales tendientes a complicar la situación militar en Europa".

UNA EVENTUAL interrupción de la anunciada retirada del contingente de 20,000 soldados y mil tanques soviéticos de territorio alemán oriental daría, según la óptica de Bonn, un componente de mayor dramatismo a la crisis este-oeste.

TAL POSIBILIDAD, confirmaría las sospechas expresadas en algunos medios periodísticos de la República Federal que apuntan "hacia un supuesto deseo soviético de desplazar a Europa la crisis localizada ahora en Oriente Medio".

Aquí
se habla
dinero
sin enredo.



En International Charter hablamos claramente de dinero - tu dinero - y como podemos protegerlo para que hagas la mejor inversión.

Nuestros verdaderos especialistas te aclararán cualquier duda que puedas tener en una forma sencilla y clara, y podrán orientarte sobre el financiamiento hipotecario que necesitas con atención personal, rapidez y confiabilidad.

Porque para nosotros cada caso es diferente y le damos el asesoramiento especial que cada caso requiere.

Por eso en International Charter hablamos financiamiento hipotecario que se entiende.

Que simple es financiar en
**INTERNATIONAL
CHARTER
MORTGAGE
CORPORATION**

MEMBER MORTGAGE BANKERS ASSOCIATION
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• AQUAMARINA RD. 30 (BARRIO LAS LAGUNAS)
• P.O. BOX 1100, HATO REY, TEL. 753-8200
• 415 BOULEVARD # 2131, LEWISTOWN, CATAN
• TEL. 784-2604-0783-1190
• AVE. NICH. FRAZARO # 455, VILLA FONTANA
• CAYMANA, TEL. 758-0800

34040482426

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8441

INVOICE TO:

INVOICE NO. 80-3-3 P

CARTER MONDALL PRESIDENTIAL COMMITTEE
R. LEE KLING, Treasure

DATE: March 14, 1980

TV CAMPAIGN PRESIDENTIAL PRIMARIES IN P.R.

WJQ TV-CHANNEL 2

For the telecast of 30 seconds TV
spots within the following programs
& dates:

7PM Soap Opera on March 10, 11, 12,
13 (2); 14 (2) at \$825.00 each.
7 spots \$ 5,775.00

BEST SELLERS on March 11 (2) at
\$450.00. 2 spots. 900.00

QUEST on March 11 (2) at \$400.00.
2 spots. 800.00

CHAPULIN COLORADO on March 11 at
\$675.00. 675.00

10PM News on March 11 (2); & March
14 (2). 4 spots. 1,300.00

10PM News on March 15 at \$125.00. 125.00

ROCKFORD FILES on March 12 (2) at
\$400.00 each. 800.00

6PM News on March 12, 13, 14 at
\$375.00. 2 spots. 750.00

HAWAII-FIVE-0 on March 13 (2) at
\$400.00. 2 spots. 800.00

FRIDAY MOVIES on March 14 at \$450.00. 450.00

SATURDAY SHOW on March 15 at \$400.00. 400.00

THE BEST FROM HOLLYWOOD on March 15
at \$350.00. 350.00

Total WJQ

\$ 13,125.00

3 4 0 4 8 2 4 2 7

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8441

INVOICE TO:

CARRER MONDALE PRESIDENTIAL COMMITTEE

INVOICE NO. 80-3-3 P

DATE:

- 2 -

WAPA TV-CHANNEL 4

For the telecast of 30 seconds TV spots within the following programs & dates:

6PM News on March 10 (2), 11 (2),
12 (2), 13 (2), 14 (2) at \$450.00
each. 10 spots. \$ 4,500.00

11PM News on March 10 (2), 11 (2),
12 (2), 13 (2), 14 (2) at \$300.00
each. 10 spots. 3,000.00

POLICE WOMAN on March 11 at \$350.00. 350.00

TUESDAY SHOW on March 11 (1) at
\$550.00 550.00

BARBUDY JONES on March 12 (1) at
\$350.00. 350.00

UFO On March 12 at \$590.00. 590.00

CHARLIE'S ANGELS on March 12 at
\$620.00. 620.00

MILLION DOLLAR MAN on March 14 at
\$420.00. 420.00

RICH MAN, POOR MAN on March 14 at
\$350.00. 350.00

Total WAPA \$ 10,730.00

Total TV \$ 23,555.00

PRODUCTION

For the production of a 30 seconds TV spot in VTR process featuring President

FRANCO & ASSOCIATES, Inc.

20 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8441

INVOICE TO:
CARTER MONDALE PRESIDENTIAL COMMITTEE

INVOICE NO. 80-3-3 F

DATE:

- 3 -

Carter & Governor Romero Barceló
including announcer, editing, &
copies in VTR.

\$ 2,475.00

total Prod.

\$ 2,475.00

TOTAL

\$26,330.00

ADDITIONAL TV SPOTS

WAPA TV

1-30 seconds TV spots within Don
Cholito at \$155.00 on March 14/80.

155.00

1-30 seconds TV spot on 11PM News
on March 15/80 at \$200.00.

200.00

WEPX TV

1-30 seconds TV spot within 7PM
Soap Opera on March 14, 1980 at
\$625.00.

625.00

Total WAPA y
WEPX

\$ 1,180.00

TOTAL

\$27,510.00

RMA N. GAGE

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-2 P

CARTER MONDALE PRESIDENTIAL COMMITTEE INC.

S. LEE KLING, Treasurer

DATE: March 14, 1980

For 6 hours radio broadcast of
last minutes instructions to
voters participating in the Sunday,
March 16, 1980 Democratic Primary;
over the following radio stations.

WUNO, SAN JUAN	\$ 1,800.00
WZOL, LUQUILLO	600.00
WMDD, FAJARDO	900.00
WNEL, CAGUAS	825.00
WNIK, ARECIBO	600.00
WCPR, COAMO	750.00
WUHA, AGUADILLA	600.00
WPRA, MAYAGUEZ	600.00
WZAR-FM, PONCE	1,250.00
WLEO, PONCE	900.00
Remote facilities charges	400.00

TOTAL \$ 9,225.00

IRHA N. GOMEZ

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE TO:

INVOICE NO. 80-3-4 P

CARTER RONDALE COMMITTEE

DATE: Marzo 14, 1980

IMPRESOS

TEMPO CREATIVE SERVICES (Factura 80-3-44)
Por la impresión de 80,000 fotos full color
del Hon. Gobernador Romero Barceló y el Pres.
Carter.

TOTAL \$ 5,000.00

3 4 9 4 0 4 3 2 4 3 1

EVA M. GOMEZ

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8445

INVOICE NO. **80-3-5 P**

DATE: **March 14, 1980**

NORDQUEN PRINTING (Factura 10998)
 Br la impresión de 80,000 hojas sueltas
 7 1/4" x 11" "Carter" en papel bond #20 a
 dos colores.

TOTAL \$ 2,300.00

I PMA M. GOMCE

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

INVOICE NO. 80-3-6 P

CARTER MONDALE PRESIDENTIAL COMMITTEE
S. LEE KLING, Treasurer

DATE: March 14, 1980

WAPA TV-CHANNEL 4

For the transmission of a half
hour program (6:-6:30PM) on Saturday
March 15/80 with the Governor & Chip
Carter.

\$ 2,000.00

Production of VTR.

500.00

TOTAL

\$ 2,500.00

Irma M. Gomez
IRMA M. GOMEZ

Approved CMPC
Edward Daulle
National Finance Chairman
3/14/80

3404048243

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-8444

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER
HATO REY, P.R.

ATT: A. VIERA MARTINEZ

INVOICE NO. 80-5-31 P

DATE: Mayo 30, 1980

PROMOCION RADIO

WUNO RADIO

Por concepto de 10 cuñas de Radio de 30 segundos transmitidas en mayo 23, 24, 1980.

\$ 150.00

WKAQ RADIO

Por concepto de 10 cuñas de Radio de 30 segundos transmitidas local en mayo 23, 24, 1980.

200.00

TOTAL

\$ 350.00

YESSA M. GOMEZ

PAID
005
3/4/80

34040482434

19 de febrero de 1980

Lic. Manuel Pérez Rodríguez
G.P.O. Box 1512
San Juan, Puerto Rico 00936

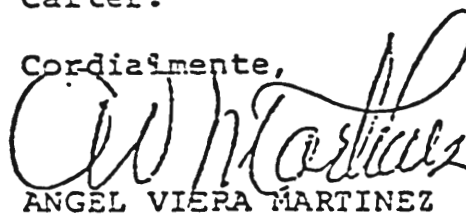
Estimado Lic. Pérez Rodríguez:

Se me ha informado que usted preside el grupo denominado "Comité Amigos de Jimmy Carter" para hacer campaña en Puerto Rico para la reelección del Presidente Jimmy Carter.

La formación de ese "Comité Amigos de Jimmy Carter" no está autorizado por el "Carter-Mondale Presidential Committee, Inc." y sus actividades no pueden estar relacionadas en forma alguna con la campaña del Comité Presidencial Carter-Mondale en Puerto Rico.

La campaña del Presidente Carter en Puerto Rico se rige por la Ley Federal de Elecciones y es necesario que se le dé cumplimiento estricto a todas las disposiciones de la Ley Federal de Elecciones con relación a la campaña del Presidente Carter.

Cordialmente,


ANGEL VIERA MARTINEZ

cc: Sr. Alberto Jurado

ENCLOSURE II

REPORT OF RECEIPTS AND DISBURSEMENT
For a Political Committee Other Than an Authorized Committee

(Summary Page)

1. Name of Committee (in Full)

AMIGOS DE JIMMY CARTER

Address (Number and Street)

G.P.O. Box 1512

City, State and ZIP Code

SAN JUAN, P.R. 00936

☐ Check if address is different than previously reported.

2. FEC Identification Number

3. ☐ This committee qualified as a multicandidate committee during this Reporting Period on _____ (date)

4. TYPE OF REPORT (check appropriate boxes)

- (a) ☒ April 15 Quarterly Report
☐ July 15 Quarterly Report
☐ October 15 Quarterly Report
☐ January 31 Year End Report
☐ July 31 Mid Year Report (Non-election Year Only)
☐ Monthly Report for _____
☐ Twelfth day report preceding _____ (Type of Election) election on _____ in the State of _____
☐ Thirtieth day report following the General Election on _____ in the State of _____
☐ Termination Report

(b) Is this Report an Amendment?
= YES = NO

SUMMARY

5. Covering Period MARCH 1 Through APRIL 30

6. (a) Cash on Hand January 1, 19____

6. (b) Cash on Hand at Beginning of Reporting Period

7. (c) Total Receipts (from Line 18)

8. (d) Subtotal (add lines 6(b) and 6(c) for Column A and lines 6(a) and 6(c) for Column B)

9. Total Disbursements (from Line 28)

10. Cash on Hand at Close of Reporting Period (subtract line 9 from 8(d))

11. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C or Schedule D)

12. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C or Schedule D)

Column A
This Period

Column B
Calendar Year-to-Date

\$

\$ 100.00

\$ 72,082.04

\$ 72,182.04

\$ 71,839.32

\$ 352.72

\$

\$

\$ 159,099.74

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

For further information, contact:

Federal Election Commission
Toll Free 800-424-9530
Local 202-523-4068

ADALBERTO JURADO

Type or Print Name of Treasurer

SIGNATURE OF TREASURER

Date

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. 5425g.

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

FEC FORM 3X (3 201)

SCHEDULE A

ITEMIZED RECEIPTS

Page 2 of for
 LINE NUMBER
 (Use separate sheets) for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

AMIGOS DE JIMMY CARTER

A. Full Name, Mailing Address and ZIP Code ZAIDA RODRIGUEZ RODRIGUEZ DZ8 URB. TORREMOJONES GUAYNABO P.R. 00657	Name of Employer Occupation	Date (month, day, year) 3/28/80	Amount of Each Receipt This Period \$ 50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

B. Full Name, Mailing Address and ZIP Code RAY K. & MALLOA K. WOOD GEORGIA, U.S.A.	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period \$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

C. Full Name, Mailing Address and ZIP Code RAMIRO RAMIREZ SAN JUAN, P.R. -	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period \$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

D. Full Name, Mailing Address and ZIP Code SAMANTHA FASHIONS BOX 1271 OLD SAN JUAN 00902	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period \$50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

E. Full Name, Mailing Address and ZIP Code MONSITA MOREYDA DEPAULA BOX 1271 OLD SAN JUAN 00902	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period \$50.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

F. Full Name, Mailing Address and ZIP Code LIC. JORGE ORTIZ TORO BOX 8845 SANTURCE POEZ TUNCO STA. P.R. 00910	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period \$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

G. Full Name, Mailing Address and ZIP Code AMIGOS JUNIOR GRUZ GUAYNABO, P.R. 00657	Name of Employer Occupation	Date (month, day, year)	Amount of Each Receipt This Period \$100.00
Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Aggregate Year-to-Date-\$		

SUBTOTAL of Receipts This Page (optional)

TOTAL This Period (last page this line number only)

34040482437

SCHEDULE A

ITEMIZED RECEIPTS

Page 1 of 1 for
 LINE NUMBER
 (Use separate schedules for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports or Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full):

AMIGOS DE JIMMY CARTER

<p>A. Full Name, Mailing Address and ZIP Code</p> <p>COOPERATIVA DE AHORROS Y CREDITO ORIENTAL BOX 221 HUMACAO, P.R. 00661</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p> <p>2/26/80</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>B. Full Name, Mailing Address and ZIP Code</p> <p>JORGE F. ROMANY APARTADO 4607 SAN JUAN, P.R. 00905</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p> <p>2/26/80</p>	<p>Amount of Each Receipt This Period</p> <p>\$50.00</p>
<p>C. Full Name, Mailing Address and ZIP Code</p> <p>CENTRO NEURO CARDIOLOGICO SAN RAFAEL 1353 SANTURCE, P.R. 00909</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p> <p>3/28/80</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>D. Full Name, Mailing Address and ZIP Code</p> <p>PARTIDO NUEVO PROGRESISTA LARES, P.R. CO. BOX 8-237 BEJUCOS</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p> <p>3/28/80</p>	<p>Amount of Each Receipt This Period</p> <p>\$100.00</p>
<p>E. Full Name, Mailing Address and ZIP Code</p> <p>CORDERO DEVELOPMENT BOX 8-237 BEJUCOS BOQUELON, P.R. 00652</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p> <p>3/28/80</p>	<p>Amount of Each Receipt This Period</p> <p>\$50.00</p>
<p>F. Full Name, Mailing Address and ZIP Code</p> <p>ANGEL L. CANINO E HIJOS CALLE FERRAN #1514 URB. ANTONSANTI, R. PIEDRAS 00927</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p> <p>3/28/80</p>	<p>Amount of Each Receipt This Period</p> <p>\$300.00</p>
<p>G. Full Name, Mailing Address and ZIP Code</p> <p>PEDRO RODRIGUEZ 323 Ing. J. A. RODRIGUEZ ST HATO REY, P.R. 00918</p> <p>Receipt For: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):</p>	<p>Name of Employer</p> <p>Occupation</p> <p>Aggregate Year-to-Date—\$</p>	<p>Date (month, day, year)</p> <p>2/28/80</p>	<p>Amount of Each Receipt This Period</p> <p>\$50.00</p>

SUBTOTAL of Receipts This Page (addition)

TOTAL This Period (last page this line number only)

SCHEDULE B

ITEMIZED DISBURSEMENTS

Page ____ of ____ for
 LINE NUMBER ____
 (Use separate schedule(s) for each
 category of the Detailed
 Summary Page)

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

Name of Committee (in Full)

AMIGOS DE JIMMY CARTER

A. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement	Date (month, day, year)	Amount of Each Disbursement This Period
JOE FRANCO & ASSOC. INC. - 1120 ASHFORD AVE. CINQUEASIS/SANTUON, P.R. 00907	ADV. RADIO & T.V. - Disbursement for: <input checked="" type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	3/4/80	\$59,000.00
B. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
C. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
D. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
E. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
F. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
G. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
H. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period
I. Full Name, Mailing Address and ZIP Code	Purpose of Disbursement Disbursement for: <input type="checkbox"/> Primary <input type="checkbox"/> General <input type="checkbox"/> Other (specify):	Date (month, day, year)	Amount of Each Disbursement This Period

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

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SCHEDULE D
(Revised 3/80)

DEBTS AND OBLIGATIONS
Excluding Loans

Page ____ of ____ for
LINE NUMBER ____
(Use separate schedules
for each numbered line)

Name of Committee (in Full)	Outstanding Balance Beginning This Period	Amount Incurred This Period	Payment This Period	Outstanding Balance at Close of This Period
AMIGOS DE JIMMY CARTER				
A. Full Name, Mailing Address and Zip Code of Debtor or Creditor JOE FRANCO & ASSOCIATES INC. 1120 ASHFORD AVE CONDADO/SAN JUAN, PR. 00907	28,099.74		59,000.00	159,099.74
Nature of Debt (Purpose): ADVERTISMENT { T.V. RADIO }				
B. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
C. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
D. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
E. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
F. Full Name, Mailing Address and Zip Code of Debtor or Creditor				
Nature of Debt (Purpose):				
1) SUBTOTALS This Period This Page (optional)				
2) TOTAL This Period (last page this line only)				
3) TOTAL OUTSTANDING LOANS from Schedule C (last page only)				
4) ADD 2) and 3) and carry forward to appropriate line of Summary Page (last page only)				

JOE FRANCO & ASSOCIATES, Inc.

1120 Ashford Avenue / San Juan, Puerto Rico 00907 / (809) 725-844

INVOICE TO:

COMITE AMIGOS DE JIMMY CARTER
HATO REY, P.R.

ATT: A. VIERA MARTINEZ

INVOICE NO. 80-5-31 P

DATE: Mayo 30, 1980

PROMOCION RADIO

WUO RADIO

Por concepto de 10 cuñas de Radio de 30
segundos transmitidas en mayo 23, 24, 1980.

\$ 150.00

WKAQ RADIO

Por concepto de 10 cuñas de Radio de 30
segundos transmitidas local en mayo 23,
24, 1980.

200.00

TOTAL

\$ 350.00

IRMA M. GOMEZ

PAID
005
3/4/80

84040482441



FEDERAL ELECTION COMMISSION

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

34040482442

THIS IS THE BEGINNING OF MUR # ^{DEPOSITIONS} 1354

Date Filmed 10/10/84 Camera No. --- 1

Cameraman JRL