

19L-23

REPORTS ANALYSIS DIVISION REFERRAL
TO
ALTERNATIVE DISPUTE RESOLUTION OFFICE

DATE: August 5, 2019

ANALYST: Nataliya Ioffe

- I. COMMITTEE: Todos con Jennifer Inc. DBA Jennifer
for Congress
C00588392
Oriol Campos Hernandez, Treasurer
P.O. Box 367111
San Juan, PR 00936
- II. RELEVANT STATUTE: 52 U.S.C. § 30104(b)(2)
11 CFR § 104.3(a)

III. BACKGROUND:

Failure to Provide Supporting Schedules (Failure to Disclose All Financial Activity)

Todos con Jennifer Inc. DBA Jennifer for Congress (“the Committee”) amended its 2018 October Quarterly Report to disclose additional receipts of \$236,776.09, which were not disclosed in the original report (Attachment 2).

On July 12, 2018, the Committee’s Treasurer, Oriol Campos Hernandez, contacted the Reports Analysis Division (RAD) Analyst to indicate that the hard drive of the Committee’s computer was damaged and the campaign lost most of its data file, which would prevent them from being able to file complete FEC reports. Mr. Campos Hernandez stated he was in the process of reentering data and encountered difficulty with importing information from prior reporting periods. He indicated some of the data could not be recovered. The RAD Analyst transferred Mr. Campos Hernandez to the Electronic Filing Office (EFO) for technical support (Attachment 3).

On July 13, 2018, the Committee filed an FEC Form 99 (Miscellaneous Electronic Submission) that stated, in full: “The hard drive of the computer crashed, so I lost all data for the last year. the begginning [sic] and ending balance are off. Will be fixed during the next cicle [sic]” (Image 201807139115391775).

On October 15, 2018, the Committee filed the original 2018 October Quarterly Report, covering the period from July 1, 2018 through September 30, 2018. The report disclosed \$17,199.42 in receipts on Line 11(a)(i) (Itemized Contributions from Individuals), no receipts on Line 11(a)(ii) (Unitemized Contributions from Individuals), and \$4,000.00 in receipts on Line 11(c) (Contributions from Other Political Committees) of the Detailed Summary Page (Image 201810159125302671, Attachment 2).

On the same date, the Committee filed an FEC Form 99 that stated, in full: "I am having trouble with the FEC File. I have to restore all the reports. I submitted an incomplete file and will complete it as soon as possible" (Image 201810159125306157).

On November 26, 2018, the Committee filed an FEC Form 99 that stated, in full: "I am having trouble amending [sic] my reports. I'm set to upload and it is not letting me" (Image 201811269133824302).

On January 23, 2019, the Committee filed an Amended 2018 October Quarterly Report. The report disclosed \$253,400.51 in receipts on Line 11(a)(i), \$100.00 in receipts on Line 11(a)(ii), and \$4,475.00 in receipts on Line 11(c) of the Detailed Summary Page, a total increase of \$236,776.09 from the original report (Image 201901239143949850).

On May 13, 2019, a Request for Additional Information (RAFI) was sent to the Committee referencing the Amended 2018 October Quarterly Report, received on January 23, 2019. Among other items, the RAFI requested clarification regarding the substantial increase in receipts disclosed in the Amended 2018 October Quarterly Report (Image 201905130300040130).¹

On June 7, 2019, the Committee filed a second Amended 2018 October Quarterly Report. The report disclosed no change to receipts on Line 11(a)(i), 11(a)(ii), or 11(c) of the Detailed Summary Page from the previous amendment (Image 201906079149955648, Attachment 2).

On July 9, 2019, RAD Management contacted the Committee's Treasurer, Oriol Campos Hernandez, about the increase in receipts on the Amended 2018 October Quarterly Report, cited in the May 13, 2019 RAFI. RAD Management explained that the issue would be referred to another Commission office for potential further action. RAD Management asked Mr. Campos Hernandez whether he would like to provide any additional explanation concerning the increase in activity. RAD Management acknowledged the FEC Form 99 he previously submitted that stated he was filing an incomplete report due to a problem with the FECFile reporting software. Mr. Campos Hernandez stated he had to reconstruct the Committee's FECFile database because the hard drive on the Committee's computer was damaged due to circumstances beyond his control. He said that due to the hard drive damage, part of the data file could not be recovered, so he filed an incomplete original 2018

¹ The RAFI cited the increase in receipts on Line 11(a)(i) and inadvertently excluded references to Lines 11(a)(ii) and 11(c). Since the RAFI cited the total amount of the increases on Lines 11(a)(i), 11(a)(ii), and 11(c), \$236,776.09, this referral references the activity on all of these lines.

RAD Referral 19L-23

Todos con Jenniffer Inc. DBA Jenniffer for Congress

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October Quarterly Report. Mr. Campos Hernandez further stated that the candidate had a big campaign event in August 2018, and re-entering that data into the new data file took significant time. He was able to reconstruct the database and file the amendment in January 2019 reflecting all of the receipts. RAD Management encouraged Mr. Campos Hernandez to file an FEC Form 99 explaining these circumstances, and he said he would do this (Attachment 3).

On July 15, 2019, the Committee filed an FEC Form 99 that stated:

"As stated on the 10/15/18 miscellaneous report, we had trouble with the accounting and FEC data, which made it impossible to submit a full report on time. Rather than not submit anything, I decided to submit a partial report with the information that was available at the moment. The complete report was submitted as soon as the data was available" (Image 201907159150604841).

To date, no further communications have been received from the Committee regarding this matter.

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O-Index (2019-2020)															
Cmte. ID: C00588392 Cmte. Name: TODOS CON JENNIFFER INC. DBA JENNIFFER FOR CONGRESS															
Treasurer Name: CAMPOS HERNANDEZ, ORIO Address: PO BOX 367111, SAN JUAN, PR 00936															
Cmte. Type: H (HOUSE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			7/15/2019	1	201907159150604841				-	-	-	-	-	-	-
F3N	Q1	N	4/13/2019	21	201904139146114302	1/1/2019	3/31/2019		\$299,386	\$19,200	\$12,117	\$306,469	-	-	\$0
F3A	Q1	A	6/7/2019	21	201906079149955787	1/1/2019	3/31/2019		\$301,557	\$19,200	\$12,117	\$308,640	-	-	\$0
F3N	Q2	N	7/15/2019	27	201907159150617538	4/1/2019	6/30/2019		\$308,640	\$42,500	\$19,122	\$332,017	-	-	\$0
Totals										\$61,700	\$31,239				

O-Index (2017-2018)															
Cmte. ID: C00588392 Cmte. Name: TODOS CON JENNIFFER INC. DBA JENNIFFER FOR CONGRESS															
Treasurer Name: CAMPOS HERNANDEZ, ORIO Address: PO BOX 367111, SAN JUAN, PR 00936															
Cmte. Type: H (HOUSE) Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE) Filing Frequency: QUARTERLY FILER															
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			4/10/2017	1	201704109052066601				-	-	-	-	-	-	-
MS-T			8/7/2017	1	201708079070297708				-	-	-	-	-	-	-
MS-T			1/31/2018	1	201801319091185898				-	-	-	-	-	-	-
MS-T			7/13/2018	1	201807139115391775				-	-	-	-	-	-	-
MS-T			10/15/2018	1	201810159125306157				-	-	-	-	-	-	-
MS-T			11/26/2018	1	201811269133824302				-	-	-	-	-	-	-
RQ2	Q1	N	7/2/2017	2	201707020300087688	1/1/2017	3/31/2017	7/2/2017	-	-	-	-	-	-	-
RQ7	Q3		11/2/2017	2	201711020300094272	7/1/2017	9/30/2017	11/2/2017	-	-	-	-	-	-	-
RQ2	Q3	N	2/28/2018	2	201802280300000320	7/1/2017	9/30/2017	2/28/2018	-	-	-	-	-	-	-
RQ2	Q2	N	5/13/2019	2	201905130300040125	4/1/2018	6/30/2018	5/13/2019	-	-	-	-	-	-	-
RQ2	Q3	A	5/13/2019	6	201905130300040130	7/1/2018	9/30/2018	5/13/2019	-	-	-	-	-	-	-
RQ2	YE	N	5/13/2019	5	201905130300040136	10/1/2018	12/31/2018	5/13/2019	-	-	-	-	-	-	-
F3N	Q1	N	4/15/2017	11	201704159052278945	1/1/2017	3/31/2017		\$21,362	\$0	\$30,686	(\$9,323)	-	-	\$0
F3A	Q1	A	8/7/2017	11	201708079070298118	1/1/2017	3/31/2017		\$23,537	\$0	\$30,686	(\$7,148)	-	-	\$0
F3N	Q2	N	7/10/2017	13	201707109066577835	4/1/2017	6/30/2017		(\$9,323)	\$13,600	\$5,394	(\$1,117)	-	-	\$0
F3A	Q2	A	8/7/2017	13	201708079070298129	4/1/2017	6/30/2017		(\$7,148)	\$14,100	\$5,394	\$1,557	-	-	\$0
F3N	Q3	N	1/31/2018	13	201801319091284699	7/1/2017	9/30/2017		\$1,557	\$2,000	\$7,533	(\$3,976)	-	-	\$0
F3N	YE	N	1/31/2018	11	201801319091291983	10/1/2017	12/31/2017		(\$3,976)	\$5,000	\$1,954	(\$931)	-	-	\$0
F3N	Q1	N	4/13/2018	12	201804139108072002	1/1/2018	3/31/2018		(\$931)	\$4,500	\$2,899	\$669	-	-	\$0
F3N	Q2	N	7/14/2018	19	201807149115466034	4/1/2018	6/30/2018		(\$9,319)	\$41,300	\$9,545	\$22,435	-	-	\$0
F3A	Q2	A	6/7/2019	19	201906079149955627	4/1/2018	6/30/2018		\$669	\$41,300	\$9,545	\$32,424	-	-	\$0
F3N	Q3	N	10/15/2018	13	201810159125302669	7/1/2018	9/30/2018		\$22,435	\$21,199	\$724	\$42,910	-	-	\$0
F3A	Q3	A	1/23/2019	77	201901239143949848	7/1/2018	9/30/2018		\$30,253	\$257,975	\$34,708	\$253,520	-	-	\$0
F3A	Q3	A	6/7/2019	81	201906079149955646	7/1/2018	9/30/2018		\$32,424	\$257,975	\$34,708	\$255,691	-	-	\$0
F3N	YE	N	1/23/2019	34	201901239143950117	10/1/2018	12/31/2018		\$253,520	\$76,803	\$30,937	\$299,386	-	-	\$0
F3A	YE	A	6/7/2019	36	201906079149955727	10/1/2018	12/31/2018		\$255,691	\$76,803	\$30,937	\$301,557	-	-	\$0
Totals										\$401,679	\$123,659				

O-Index (2015-2016)															
Cmte. ID: C00588392 Cmte. Name: TODOS CON JENNIFFER INC. DBA JENNIFFER FOR CONGRESS															
Treasurer Name: CAMPOS HERNANDEZ, ORIO Address: PO BOX 367111, SAN JUAN, PR 00936															

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Cmte. Type: H (HOUSE)					Cmte. Designation: P (PRINCIPAL CAMPAIGN COMMITTEE OF A CANDIDATE)				Filing Frequency: QUARTERLY FILER						
Form Tp	Rpt Tp	A/I	Recpt Dt	Pgs	Begin Img#	Beg Cvg Dt	End Cvg Dt	Ltrr Mail Dt	Begin Cash	Recpts	Disb	End Cash	Debts	Loans	Debts & Loans
MS-T			10/20/2016	1	201610209034495289				-	-	-	-	-	-	-
RQ2	YE	N	3/28/2016	3	201603280300040451	10/1/2015	12/31/2015	3/28/2016	-	-	-	-	-	-	-
RQ2	Q2	N	9/15/2016	3	201609160300058679	5/17/2016	6/30/2016	9/15/2016	-	-	-	-	-	-	-
RQ2	Q2	N	9/10/2017	2	201709110300092722	5/17/2016	6/30/2016	9/10/2017	-	-	-	-	-	-	-
RQ2	30G	A	3/5/2017	3	201703050300081928	10/20/2016	11/28/2016	3/5/2017	-	-	-	-	-	-	-
RQ2	YE	N	3/5/2017	2	201703050300081931	11/29/2016	12/31/2016	3/5/2017	-	-	-	-	-	-	-
F3N	Q3	N	10/15/2015	14	201510159003083480	7/1/2015	9/30/2015		\$0	\$60,050	\$0	\$60,050	-	-	\$0
F3N	YE	N	1/31/2016	51	201601319005201612	10/1/2015	12/31/2015		\$60,050	\$50,200	\$37,955	\$72,294	-	-	\$0
F3A	YE	A	6/17/2016	56	201606179018429204	10/1/2015	12/31/2015		\$60,050	\$50,200	\$37,955	\$72,294	-	-	\$0
F3N	Q1	N	4/15/2016	85	201604159012555534	1/1/2016	3/31/2016		\$72,294	\$149,700	\$41,403	\$180,591	-	-	\$0
F3A	Q1	A	6/17/2016	85	201606179018429475	1/1/2016	3/31/2016		\$72,294	\$149,700	\$41,403	\$180,591	-	-	\$0
F3N	12P	N	5/24/2016	62	201605249017294764	4/1/2016	5/16/2016		\$180,591	\$69,010	\$135,668	\$113,933	-	-	\$0
F3A	12P	A	6/17/2016	62	201606179018429655	4/1/2016	5/16/2016		\$180,591	\$69,010	\$135,668	\$113,933	-	-	\$0
F3A	12P	A	6/30/2016	63	201606309020105657	4/1/2016	5/16/2016		\$180,591	\$70,927	\$137,585	\$113,933	-	-	\$0
F3A	12P	A	7/9/2016	63	201607099020386068	4/1/2016	5/16/2016		\$180,591	\$69,968	\$136,626	\$113,933	-	-	\$0
F3A	12P	A	7/14/2016	67	201607149020479825	4/1/2016	5/16/2016		\$180,591	\$67,268	\$155,845	\$92,014	-	-	\$0
F3A	12P	A	8/7/2017	67	201708079070297641	4/1/2016	5/16/2016		\$180,591	\$67,268	\$154,445	\$93,414	-	-	\$0
F3N	Q2	N	7/15/2016	97	201607159020658260	5/17/2016	6/30/2016		\$92,014	\$109,261	\$146,481	\$54,794	-	-	\$0
F3A	Q2	A	6/7/2019	97	201906079149955530	5/17/2016	6/30/2016		\$93,414	\$109,261	\$146,481	\$56,194	-	-	\$0
F3N	Q3	N	10/15/2016	166	201610159032875290	7/1/2016	9/30/2016		\$54,794	\$230,607	\$102,429	\$182,973	-	-	\$0
F3A	Q3	A	8/7/2017	166	201708079070297709	7/1/2016	9/30/2016		\$56,194	\$230,607	\$101,922	\$184,880	-	-	\$0
F3N	12G	N	10/27/2016	97	201610279036993182	10/1/2016	10/19/2016		\$182,973	\$61,339	\$124,534	\$119,777	-	-	\$0
F3A	12G	A	8/7/2017	97	201708079070297875	10/1/2016	10/19/2016		\$184,880	\$61,339	\$124,396	\$121,822	-	-	\$0
F3N	30G	N	12/8/2016	117	201612089040585815	10/20/2016	11/28/2016		\$119,777	\$210,281	\$283,864	\$46,195	-	-	\$0
F3A	30G	A	12/30/2016	132	201612309040906888	10/20/2016	11/28/2016		\$119,777	\$212,831	\$293,861	\$38,747	-	-	\$0
F3A	30G	A	4/10/2017	133	201704109052066642	10/20/2016	11/28/2016		\$119,777	\$212,831	\$295,742	\$36,866	-	-	\$0
F3A	30G	A	4/10/2017	140	201704109052066828	10/20/2016	11/28/2016		\$119,777	\$212,831	\$295,746	\$36,862	-	-	\$0
F3A	30G	A	4/11/2017	132	201704119052076439	10/20/2016	11/28/2016		\$119,777	\$212,831	\$295,742	\$36,866	-	-	\$0
F3A	30G	A	8/7/2017	132	201708079070297972	10/20/2016	11/28/2016		\$121,822	\$212,961	\$295,742	\$39,041	-	-	\$0
F3N	YE	N	1/31/2017	13	201701319042374240	11/29/2016	12/31/2016		\$38,747	\$0	\$15,503	\$23,244	-	-	\$0
F3A	YE	A	4/10/2017	14	201704109052067022	11/29/2016	12/31/2016		\$36,862	\$0	\$15,547	\$21,314	-	-	\$0
F3A	YE	A	4/11/2017	14	201704119052076616	11/29/2016	12/31/2016		\$36,866	\$0	\$15,503	\$21,362	-	-	\$0
F3A	YE	A	8/7/2017	14	201708079070298104	11/29/2016	12/31/2016		\$39,041	\$0	\$15,503	\$23,537	-	-	\$0
F1A		A	1/22/2016	4	201601229004566258				-	-	-	-	-	-	-
F6A			6/30/2016	7	201606309020105631				-	-	-	-	-	-	-
F1A		A	7/1/2016	4	201607019020110829				-	-	-	-	-	-	-
F6N			11/6/2016	2	201611069037127400				-	-	-	-	-	-	-
F6N			11/4/2016	4	201611049037123959				-	-	-	-	-	-	-
F6N			10/30/2016	1	201610309037010707				-	-	-	-	-	-	-
F6N			10/27/2016	1	201610279036989177				-	-	-	-	-	-	-
F6N			10/26/2016	1	201610269034635789				-	-	-	-	-	-	-
F1A		A	12/30/2016	4	201612309040907059				-	-	-	-	-	-	-
F2N		N	12/30/2016	1	201612309040907020				-	-	-	-	-	-	-
F2		N	9/21/2015	4	201509230300023445				-	-	-	-	-	-	-
F6N			6/4/2016	2	201606049017470484				-	-	-	-	-	-	-
F6N			5/30/2016	7	201605309017318009				-	-	-	-	-	-	-

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F1A		A	6/3/2016	4	201606039017468501					-	-	-	-	-	-	-
F1N		N	9/30/2015	4	201509309002788249					-	-	-	-	-	-	-
F6N			10/24/2016	3	201610249034544836					-	-	-	-	-	-	-
F6N			10/22/2016	7	201610229034529620					-	-	-	-	-	-	-
Totals										\$941,389	\$917,851					

Todos con Jenniffer Inc. DBA Jenniffer for Congress (C00588392)

2018 October Quarterly Report/Amended 2018 October Quarterly Report, received 6/7/2019

Overview of Additional Receipts

Report Line	Original 2018 October Quarterly Report (Image 201810159125302671)	Amended 2018 October Quarterly Report, received 6/7/2019 (Image 201906079149955648)	Receipt Variance Amount
Line 11(a)(i): Itemized Contributions from Individuals	\$17,199.42	\$253,400.51	\$236,201.09
Line 11(a)(ii): Unitemized Contributions from Individuals	\$0.00	\$100.00	\$100.00
Line 11(c): Contributions from Other Political Committees	\$4,000.00	\$4,475.00	\$475.00
Total Variance:			\$236,776.09