

**U.S. CUBA DEMOCRACY PAC
(POLITICAL ACTION COMMITTEE)**

1200 West 49th Street
Hialeah, Florida 33012

January 8, 2007

Mr. Jeff S. Jordan
Office of the General Counsel
Federal Election Commission
Washington, D.C. 20463

Re: MUR 5890

Dear Mr. Jordan:

This letter is in response to a complaint (MUR 5890) received by the Federal Election Commission ("Commission") alleging violations by Respondents, the U.S.-Cuba Democracy PAC ("the PAC") (C00387720) and Mr. Gus Machado, Treasurer, of the Federal Election Campaign Act of 1971 ("FECA").

The complaint filed by Citizens for Responsibility and Ethics in Washington ("CREW") is full of factual inaccuracies, mischaracterizations and defamatory statements.

The *Miami Herald* article (November 29th, 2006) referenced in CREW's complaint does not state that the PAC "has paid" outside lawyers or law firms to reply to Commission inquiries, as falsely alleged by CREW. The PAC has never consulted, and thus never compiled any outstanding debt, with any outside lawyer or law firm regarding any allegations filed with the Commission by CREW. All responses to Commission inquiries have been diligently and promptly drafted -- on a volunteer basis -- by the PAC's Executive Committee, in consultation with its Board of Directors.

The statement made by Mr. Mauricio Claver-Carone, as a member of the PAC's Board of Directors, to the *Miami Herald* was a personal reflection on CREW's motives and methodology. Mr. Claver-Carone expressed to the *Miami Herald* that CREW's various allegations against the PAC were politically motivated, as CREW receives substantial funding from organizations that actively advocate against the PAC's pro-democracy principles. This fact was verified in the article by the *Miami Herald*.

Mr. Claver-Carone proceeded to explain to Mr. Pablo Bachelet, the *Miami Herald* reporter, that -- in practice -- responding to similar allegations would typically mean a political committee paying a law firm \$15,000-\$20,000 in fees, and that forcing such a dramatic financial impact was exactly part of CREW's motive and methodology.

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Nonetheless, Mr. Claver-Carone stressed to Mr. Bachelet that the PAC had responded to CREW's allegations without consulting any outside lawyer or law firm, and therefore, had not incurred any of the intended legal debts or obligations. The PAC has requested a clarification from the *Miami Herald*, and encourages the Commission to contact Mr. Pablo Bachelet, (202) 383-6019, at the *Miami Herald* for corroboration.

Please do not hesitate to contact me with any further questions.

Thank you for your time and attention.

Sincerely,


Gus Machado
Treasurer

BEFORE THE FEDERAL ELECTION COMMISSION

U.S.-Cuba Democracy PAC
Gus Machado

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MUR 5890

AFFIDAVIT OF GUS MACHADO

I, Gus Machado, hereby swear that the following information is based on my personal knowledge, that I am competent to testify, and that it is both true and correct:

1. I am the Treasurer of the U.S.-Cuba Democracy PAC ("the PAC").
2. The PAC has never consulted, and thus never compiled any outstanding debt, with any outside lawyer or law firm regarding any allegations filed with the Federal Elections Commission ("Commission") by Citizens for Responsibility and Ethics in Washington ("CREW").


Gus Machado

Dated: January 10, 2007

Signed and sworn to before me this 10 day of January, 2007.



NOTARY PUBLIC

My commission expires:



Ana C. Arisso
Commission #DD303689
Expires: Mar 25, 2008
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