



FEDERAL ELECTION COMMISSION
Washington, DC 20463

January 29, 2004

MEMORANDUM

TO: The Commission

THROUGH: James A. Pehrkon
Staff Director

FROM: Allan D. Silberman
Director, ADR Office

SUBJ: Negotiated Settlement: **ADR 130**

Attached for your review is a signed negotiated ADR settlement agreement, **ADR 130**, (MUR 5312) Wahtenaw County Democratic Party ("WCDP") and Barbara Ryan Fuller, Treasurer, ("the Respondents"). This case was received by the Commission on September 27, 2002 and assigned to the ADR Office on July 11, 2003.

ADR 130:

1. The complaint, filed on behalf of the Michigan Republican State Committee, alleges that Respondents should have registered when it expended more than \$1,000 on federal elections during 2000. Respondents specifically are charged with disbursing \$3,667 on behalf of Gore/Lieberman, Inc., Byrum for Congress, Rivers for Congress and Stabenow for U.S. Senate, as well as making direct contributions of \$500 each to Byrum for Congress and Rivers for Congress. WCDP also is charged with having spent \$2,000 for campaign office rent and \$8,295 for various campaign related activities including GOTV and campaign materials. WCDP, an unregistered local (MI) party committee, acknowledged expending the aforementioned funds based on the assumption that the disbursements were exempt federal expenditures and need not be reported.
2. Byrum for Congress and Hilda Patricia Curran, Treasurer, and Rivers for Congress and Barbara Ryan Fuller, Treasurer, both acknowledged receiving and subsequently reporting receipt of the aforementioned direct contributions. Other aspects of the complaint regarding these Committees are unsubstantiated. Accordingly, the allegations against both Committees and their respective Treasurers should be dismissed.

3. Regarding Gore/Lieberman, Inc., and Jose Villarreal, Treasurer and Stabenow for U.S. Senate and Angela M. Autera, Treasurer, neither committee was alleged in the complaint to have violated the Act. Lacking evidence of a violation, the matters pertaining to both Committees and their respective treasurers are recommended for dismissal.

Recommendations:

1. We recommend that the Commission approve the attached negotiated agreement for ADR 130 and subsequently close the file on this matter;
2. We recommend that the Commission dismiss the complaint as it pertains to Byrum for Congress and Hilda Patricia Curran, Treasurer and Rivers for Congress and Barbara Ryan Fuller, Treasurer and close the file on this matter;
3. We recommend that the Commission dismiss this matter as it pertains to Gore/Lieberman, Inc., and Jose Villarreal, Treasurer and Stabenow for U.S. Senate and Angela M. Autera, Treasurer and close the file on this matter.