




FEDERAL ELECTION COMMISSION
Washington, DC 20463

MEMORANDUM

October 27, 2004

TO: The Commission

THROUGH: James A. Pehrkon
Staff Director

FROM: Allan D. Silberman 
Director, ADR Office

SUBJ: Negotiated Settlement: **ADR 157**

Attached for your review is a signed negotiated ADR settlement agreement, **ADR 157** (MUR 5397), respondents Charlie Dent for Congress and Jeff Berdahl, Treasurer ("the Respondents"). This case file was opened on November 25, 2003 and assigned to the ADR office on March 18, 2004.

ADR 157: The complaint alleges that the Respondents, Charlie Dent for Congress and Jeff Berdahl, Treasurer, made several expenditures that were not listed on their July 2003 Quarterly Report. Complainant contends that Respondents made disbursements for various operating expenditures including mailing lists, post office box rental, office products, consulting fees and travel to Washington D.C. that were not included in the July 2003 report. Respondents contend that the complaint has no basis in fact. They argue that a number of the items listed in the complaint were included in the subsequent October 2003 Quarterly Report as portions of other expenditures or listed separately on that Report. Respondents also note the use of volunteers for activities cited in the complaint and use of the candidate's home for campaign-related activities. They further contend that the candidate's trip to D.C. occurred prior to the candidate's declaration of candidacy.

Recommendation: We recommend that the Commission approve the attached negotiated agreement **ADR 157** and subsequently close the file on this matter.

24-19-025-4193