



FEDERAL ELECTION COMMISSION
Washington, DC 20463

RECEIVED
FEDERAL ELECTION
COMMISSION
SECRETARIAT

2006 JAN 20 A 10:47
January 12, 2006

MEMORANDUM

SENSITIVE

TO: The Commission

THROUGH: Robert J. Costa *AK*
Acting Staff Director

FROM: Allan D. Silberman *AS*
Director, ADR Office

SUBJ: ADR 278 – Dollars for Democrats and Ann Fishman, Treasurer
Recommendation to Approve Settlement Agreement

Attached for your review is a signed negotiated ADR settlement agreement pertaining to ADR 278/RAD 05L-24, Dollars for Democrats and Ann Fishman, Treasurer (the “Respondents” or the “Committee”). This matter was opened on May 24, 2005 and assigned to the ADR Office on July 22, 2005. Following informal discussions with OGC and RAD, the ADR Office entered into negotiations with Respondents which resulted in the attached settlement agreement.

RAD determined that Respondents failed to report a \$139,624.37 increase in additional receipts on their 2004 Twelve Day Pre-General Report. Respondents original 2004 12 Day Pre-General Report, filed on 10/25/04 disclosed \$0 receipts for itemized contributions from individuals/persons other than political committees and for unitemized contributions from individuals/persons other than political committees. Respondents amended 12 Day Pre-General Report filed on 12/1/04 disclosed \$33,748.00 in receipts for itemized contributions from individuals/persons other than political committees and \$105,876.37 in receipts for unitemized contributions from individuals/persons other than political committees. Respondents, however, subsequently contended that since they did not make contributions or expenditures on behalf of any candidate for Federal office during the reporting period there was no requirement that the Committee file the 12 Day Pre-General Report.

Recommendations:

- 1) Approve the attached Settlement Agreement pertaining to Dollars for Democrats and Ann Fishman, Treasurer.
- 2) Approve the appropriate letters.
- 3) Close the file on this matter.

26190264216