



THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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November 25, 2005

MEMORANDUM

TO: The Commission

THROUGH: Robert J. Costa   
Acting Staff Director

FROM: Allan D. Silberman   
Director, ADR Office

BY: Lynn M. Fraser   
Assistant Director, ADR Office

**SENSITIVE**

SUBJECT: ADR 293 Thelma Drake for Congress and Robert J. Catron, Treasurer  
Recommendation to Approve Settlement Agreement

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 293 (RR 05L-43). This case was opened on August 22, 2005 and was assigned to the ADR Office on September 19, 2005.

**SUMMARY:** RAD referred Thelma Drake for Congress and Robert J. Catron, Treasurer ('Respondents' or the "Committee") for failing to provide the required contributor information for 171 of 429 of the itemized contributions received from individuals during the 2003-2004 election cycle. The lack of adequate contributor identification on the 2004 October Quarterly, 2004 12 Day Pre-General and 2004 30 Day Post General reports resulted in inadequate identification of 40% of itemized contributions from the Committee. In response to RFAs sent to the Committee, Respondents sent amended reports. Those amended reports, however, did not remedy the omissions, and one amended report actually increased the percentage of itemized contributors without adequate identification. On May 2, 2005, Respondents filed a miscellaneous electronic text message outlining what the Committee routinely does to satisfy "best efforts" requirements to obtain the information. As Respondents provided documentation of their "best efforts," the violations are unsubstantiated.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Thelma Drake for Congress and Robert J. Catron, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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