



THE FEDERAL ELECTION COMMISSION
Washington, DC 20463

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SENSITIVE

MEMORANDUM

October 24, 2006

TO: The Commission

THROUGH: Patrina M. Clark *pmc*
Staff Director

FROM: Lynn M. Fraser, Acting Director *lmf*
Alternative Dispute Resolution Office

SUBJECT: ADR 302 International Brotherhood of Electrical Workers Local 98
Committee on Political Education and John J. Dougherty, Treasurer,
Recommendation to Approve Settlement Agreement

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 302 (RR 05L-60)**. This case was opened on October 18, 2005, and was assigned to the ADR Office on November 29, 2005.

SUMMARY: RAD referred the International Brotherhood of Electrical Workers Local 98 Committee on Political Education and John Dougherty, Treasurer ("Respondents" or the "Committee") for failing to file one 48-Hour Notice in support of an independent expenditure totaling \$68,284 disclosed on the 2004 12 Day Pre-General Report. In addition, the Committee failed to file one 24-Hour Notice to support three independent expenditures totaling \$56,088.97 disclosed on an Amended 2004 30 Day Post General Report. RAD confirmed that a prior notice listing official filing dates for quarterly filers during the 2004 calendar year was sent to Respondents on September 27, 2004. The notice included a section titled 48 and 24 Hour Reports on Independent Expenditures, explaining when independent expenditures triggered the required 48 or 24 Hour Notices.

Respondents contend that they misinterpreted the FECA, and thought their disclosure of independent expenditures on schedule E was sufficient.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of International Brotherhood of Electrical Workers Local 98 Committee on Political Education and John Dougherty, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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