



THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

2006 MAR 23 AM 11:48

**SENSITIVE**

MEMORANDUM

March 22, 2006

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

SUBJECT: ADR 318 Hall for Congress and J. Blakeley Hall, Treasurer,  
Recommendation to Assign Case

On February 27, 2006, the ADR Office received RR 05L-21 to review and determine its appropriateness for ADR processing. Based on that review, we determined that the case is appropriate for ADR, and recommend that it be assigned to the ADR Office.

**SUMMARY:** RAD referred Hall for Congress and J. Blakeley Hall, Treasurer, (“Respondents” or the “Committee”) for failing to disclose all financial activity on the Committee’s 2004 April Quarterly Report. Respondents filed the original 2004 April Quarterly Report on April 14, 2004, that disclosed \$6,078.76, in operating expenditures, and \$55,121.28, in other disbursements. Respondents filed an amended 2004 April Quarterly Report on July 15, 2004, that disclosed additional disbursements totaling \$284,563.37. The amended 2004 April Quarterly Report disclosed \$343,763.41, for operating expenditures, and \$2,000, for other disbursements, resulting in an increase in disbursements of \$284,563.37. On October 15, 2004, Respondents filed a second amended 2004 April Quarterly Report, but that amendment disclosed no additional disbursements. RAD sent a RFAI to the Committee on October 21, 2004, referencing the amendments to the 2004 April Quarterly Report.

27190270428

In response to the RFAI, Respondents filed a miscellaneous electronic submission stating they had been unaware that all activity should be reported on the original filing. They also indicated that now they understand what is required, future reports will be complete.

Attached for the Commission's review is the ADR Case Analysis Report, along with copies of the EPS Rating and ADR Rating reports. The ADR Case Analysis Report includes an analysis of the case and a description of the issues that the ADR Office anticipates addressing if the case is assigned to ADR. In addition, the ADR Case Analysis Report has been reviewed by the Office of General Counsel, which concurs in the description of the case.

If the Commission concurs in the recommendation, the above case description will be provided to Respondents as part of ADR Office's notification package sent to Respondents.

**RECOMMENDATION:**

1. Assign ADR 318/RR 05L-21 to the ADR Office.

27190270429

## ADR CASE ANALYSIS REPORT

**ADR Case:** 318

**Respondents:**

Hall for Congress

J. Blakeley Hall, Treasurer

**RAD Referral:** 05L-21

**Respondents' Rep.:** J. Blakeley Hall

**Date Forwarded to ADRO:** 2/27/06

**Committee Type:** Authorized

**Date Reviewed by ADRO:** 3/9/06

**Committee Name:** Hall for Congress

**District & State:** 4<sup>th</sup> C.D. TX

**Election Won-Lost:** Won General

**Election Cycle:** 2004

**Summary of Referral:** RAD referred Hall for Congress and J. Blakeley Hall, Treasurer, ("Respondents" or the "Committee") for failing to disclose all financial activity on the Committee's 2004 April Quarterly Report. Respondents filed the original 2004 April Quarterly Report on April 14, 2004, that disclosed \$6,078.76, in operating expenditures, and \$55,121.28, in other disbursements. The Commission received an amended 2004 April Quarterly Report on July 15, 2004, that disclosed additional disbursements totaling \$284,563.37. The amended 2004 April Quarterly Report disclosed \$343,763.41, for operating expenditures, and \$2,000, for other disbursements, resulting in an increase in disbursements of \$284,563.37. On October 15, 2004, Respondents filed a second amended 2004 April Quarterly Report, but that amendment disclosed no additional disbursements. RAD sent a RFAI to the Committee on October 21, 2004, referencing the amendments to the 2004 April Quarterly Report.

**Respondents' Reply to RAD:** In response to the RFAI, Respondents filed a miscellaneous electronic submission stating "[o]ur committee is now aware that all activity should be reported on the original filing. Future reports will contain all receipts/and or [sic] disbursement for that reporting period." Following several telephone conversations with a RAD analyst, the Committee filed an additional electronic submission on December 7, 2004, stating "[t]he disbursements that have been disclosed on the original reports are what we have record of at the time of filing. Some disbursements are not recorded until we have received the committees [sic] bank statements and are then disclosed on an amendment. It has been our committees [sic] understanding that this was in compliance. We have been made aware that all disbursements must be disclosed on the original report."

27190270430

**Recommendation:**  
Assign to ADRO

27190270431