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THE FEDERAL ELECTION COMMISSION
Washington, DC 20463

SENSITIVE

MEMORANDUM

April 27, 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 322 International Association of Firefighters Interested in Registration and Education PAC and Vincent J. Bollon, Treasurer, Recommendation to Assign Case

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On April 5, 2006, the ADR Office received RR 06L-09 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 the International Association of Firefighters Interested in Registration and Education PAC and Vincent J. Bollon, Treasurer, ("Respondents" or the "Committee") for failing to file required 48-Hour and 24-Hour Notices, as well as all financial activity. Specifically, the Committee failed to file four (4) 48-Hour Notices to support four (4) independent expenditures, totaling $102,993.20, and four (4) 24-Hour Notices to support five (5) independent expenditures, totaling $35,584.50. Additionally, the Committee filed Amended 2005 March Monthly Reports on April 4, 2005, and May 13, 2005, disclosing $75,249.79 in additional receipts.

In response to the RFAI's sent to the Committee relative to the 48-Hour and 24-Hour Notices, Respondents acknowledged the omission of the 48-Hour and 24-Hour Notices, and said that they had taken appropriate steps and it should not happen again. In response to an RFAI sent to the Committee, referencing the Amended 2005 March Monthly Report, Respondents contend that the omission

occurred due to a technical problem that prevented all receipts from being entered in the database.

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 322/RR 06L-09** to the ADR Office.

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ADR CASE ANALYSIS REPORT

ADR Case: 322

RAD Referral: 06L-09

Date Forwarded to ADRO: 4/5/06

Date Reviewed by ADRO: 4/24/06

Respondents:
International Association of Firefighters
Interested in Registration and Education PAC
Vincent J. Bollon, Treasurer

Respondents' Rep.: Vincent J. Bollon

Committee Type: Non-Party

Committee Name:
International Association of Firefighters
Interested in Registration and Education PAC

District & State: N/A

Election Won-Lost: N/A

Election Cycle: 2004

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Summary of Referral: RAD referred the International Association of Firefighters Interested in Registration and Education PAC and Vincent J. Bollon, Treasurer, ("Respondents" or the "Committee") for failing to file required 48-Hour and 24-Hour Notices, as well as all financial activity. Specifically, the Committee failed to file four (4) 48-Hour Notices to support four (4) independent expenditures, totaling $102,993.20 made between January 1st and the 20th day before the 2004 Presidential Primary Elections held in the States of Arkansas and Kentucky, and between January 1st and the 20th day before the 2004 General Election. Respondents also failed to file four (4) 24-Hour Notices to support five (5) independent expenditures, totaling $35,584.50 made less than 20 days, but more than 24 hours, before the 2004 General Election. Additionally, the Committee filed Amended 2005 March Monthly Reports on April 4, 2005, and May 13, 2005, disclosing $75,249.79 in additional receipts.

Respondents' Reply to RAD: In response to the RFAI's sent to the Committee relative to the 48-Hour and 24-Hour Notices, Respondents stated "[w]ith regard to the independent expenditures and their disclosure on 24- and 48-Hour reports, the Committee has reviewed its records and concurs with the Commission's interpretation. Action has been taken to educate staff and improve procedures to insure this does not happen in the future." In response to an RFAI sent to the Committee on June 15, 2005, referencing the Amended March Monthly Report, Respondents stated, "[t]he difference between the two reports was due to a technical error that prevented these receipts from being entered into the Committee's membership database, and subsequently into the Committee's FEC reporting software."

Recommendation:
Assign to ADRO