



THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

FEDERAL ELECTION  
COMMISSION  
SECRETARIAT

2006 JUN 14 P 3: 32

**SENSITIVE**

MEMORANDUM

June 12, 2006

TO: The Commission

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

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

BY: Lynn M. Fraser *LF*  
Assistant Director, ADR Office

SUBJECT: ADR 326 William Bain Adams,  
Recommendation to Dismiss

On May 19, 2006, the ADR Office received MUR 5706 from the Office of General Counsel ("OGC") to review and determine its appropriateness for ADR processing. Based on that review, we determined that the case is inappropriate for ADR and recommend that it be closed. Following the procedures approved by the Commission on March 3, 2003, this matter will be closed by the ADR Office if the Commission approves the recommendation in this Memorandum. OGC concurs in the description of this matter, and that it will not be returned to OGC for further action.

**SUMMARY:** Complainant, TheRestofUs.org, alleged that William Bain Adams ("Respondent") exceeded the federal aggregate contribution limit of \$25,000 in 2002. The complaint asserted that Respondent contributed a total of \$28,000 during 2002. In an amendment filed with the Commission, the Complainant alleged that after further research, it concluded that Respondent actually contributed \$25,500 during 2002, rather than the amount alleged in the original complaint, thus exceeding the limit by \$500. Respondent did not file an answer to the allegations.

**Note:** A Google search turned up Respondent's name in connection with possible illicit contributions to committees and a DOD contractor, Brent Wilkes and two former members of Congress, Randy Cunningham and Tom DeLay. However, since these allegations are outside the scope of the complaint filed by The RestofUs.org, and

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apparently are being investigated by the Department of Justice, ADRO did not consider the media reports as relevant to the analysis of this complaint.

Attached for the Commission's review is the ADR Case Analysis Report on ADR 326. The EPS Rating and ADR Rating reports are available for review in the shared folder, Voting Ballot Matters.

**RECOMMENDATIONS:**

1. **Dismiss ADR 326/MUR 5706, and close the file as to Respondent, William Bain Adams.**
2. **Approve the appropriate letters.**

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## ADR CASE ANALYSIS REPORT

**ADR Case:** 326

**MUR:** 5706

**OGC Case Open Date:** 02/06/2006

**Date Forwarded to ADRO:** 05/19/2006

**Date Reviewed by ADRO:** 05/25/2006

**Respondents:**

William Bain Adams

**Respondent's Rep.:**

William Bain Adams

**Committee Name:** - - -

**Committee Type:** - - -

**District #/or State:** - - -

**Election - Won/Lost:** - - -

**Election Cycle:** 2002

**Complainant:** Ned Wigglesworth, Analyst  
TheRestofUs.org

**Summary of Complaint:** Complainant, TheRestofUs.org, alleged that William Bain Adams ("Respondent") exceeded the federal aggregate contribution limit of \$25,000 in 2002. The complaint asserted that Respondent contributed a total of \$28,000 during 2002. In an amendment filed with the Commission, the Complainant alleged that after further research, it concluded that Respondent actually contributed \$25,500 during 2002, rather than the amount alleged in the original complaint.

**Respondent's Reply:** Respondent did not file a reply to the Complaint.

<b>Recommendation:</b> Dismiss
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