



THE FEDERAL ELECTION COMMISSION
Washington, DC 20463


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
MEMORANDUM

June 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 332 Leo Burnett Worldwide, Inc.,
Recommendation to Assign Case

On June 2, 2006, the ADR Office received PMUR 427 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: Leo Burnett Worldwide, Inc. filed this *sua sponte* submission, in which it acknowledges a violation of 2 U.S.C. §§ 441b(a) and 441f of the FECA. Specifically, Leo Burnett Worldwide, Inc. ("Leo Burnett") submits that it, Leo Burnett USA, Inc. ("Leo Burnett USA"), and Raymond T. DeThorne ("DeThorne") (collectively "Respondents") acknowledge that DeThorne, a Leo Burnett USA Executive Vice President, received reimbursement from his employer for a contribution of \$10,000 to the National Republican Congressional Committee in January 2004. Respondents contend that Leo Burnett's Chief Executive Officer and Chief Financial Officer were not aware that corporate reimbursement for a federal political contribution, such as the one made by DeThorne, was impermissible. Respondents assert that DeThorne repaid the \$10,000 to Leo Burnett USA in May 2005. In addition, the corporations took other remedial steps to ensure future compliance with the FECA, including a request the NRCC disgorge the \$10,000 to the U.S. Treasury.

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RECOMMENDATION:

1. **Assign ADR 332/PMUR 427 to the ADR Office.**

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ADR CASE ANALYSIS REPORT

ADR Case: 332

Respondents:

Leo Burnett Worldwide, Inc.
Leo Burnett USA, Inc.
Raymond T. DeThorne

P-MUR: 427

Respondents' Rep.: Benjamin L. Ginsberg, Esq.
and Eric S. Brown, Esq.

OGC Case Open Date: 7/18/05

Committee Name: --

Date Forwarded to ADRO: 6/2/06

Committee Type: --

Date Reviewed by ADRO: 6/14/06

District #/or State: --

Election - Won/Lost: --

Election Cycle: 2004

Complainant:

Leo Burnett Worldwide, Inc.

Summary of Complaint: Leo Burnett Worldwide, Inc. filed this *sua sponte* submission, in which it acknowledges a violation of 2 U.S.C. §§ 441b(a) and 441f of the FECA. Specifically, Leo Burnett Worldwide, Inc. ("Leo Burnett") submits that it, Leo Burnett USA, Inc. ("Leo Burnett USA"), and Raymond T. DeThorne ("DeThorne") (collectively "Respondents") acknowledge that DeThorne, a Leo Burnett USA Executive Vice President, received reimbursement from his employer for a contribution of \$10,000 to the National Republican Congressional Committee in January 2004. Respondents contend that Leo Burnett's Chief Executive Officer and Chief Financial Officer were not aware that corporate reimbursement for a federal political contribution, such as the one made by DeThorne, was impermissible. Respondents assert that DeThorne repaid the \$10,000 to Leo Burnett USA in May 2005. In addition, the corporations took other remedial steps to ensure future compliance with the FECA, and also requested the NRCC disgorge the \$10,000 directly to the U.S. Treasury.

Recommendation:

Assign to ADRO

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