



THE FEDERAL ELECTION COMMISSION
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SENSITIVE

MEMORANDUM

February 12, 2007

TO: The Commission

THROUGH: Patrina M. Clark *[Signature]*
Staff Director

FROM: Margarita Maisonet *[Signature]*
Chief Compliance Officer

Deborah Kant *[Signature]*
Director, ADR Office

BY: Lynn M. Fraser *[Signature]*
Assistant Director, ADR Office

SUBJECT: ADR 332 Leo Burnett Worldwide, Inc., Leo Burnett USA, Inc., and
Raymond T. DeThorne, Recommendation to Approve Settlement
Agreement

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 332 (P-MUR 427). This case was opened on July 18, 2005, and was assigned to the ADR Office on September 13, 2006.

SUMMARY: Leo Burnett Worldwide, Inc., an international corporation, filed this submission. The *sua sponte* submission acknowledges a violation of the FECA under 2 U.S.C. §§ 441b(a) (prohibited corporate contributions) and 441f (contributions made in the name of another). 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 ("NRCC") 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

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impermissible. Respondents assert that DeThorne repaid the \$10,000 to Leo Burnett USA in May 2005, months before the sua sponte submission was filed. 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.

RECOMMENDATIONS:

1. Approve the attached settlement agreement of Leo Burnett Worldwide, Inc., Leo Burnett USA, Inc., and Raymond T. DeThorne.
2. Approve the appropriate letters.
3. Close the file on this matter.

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