



THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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**SENSITIVE**

MEMORANDUM

December 20, 2006

TO: The Commission

THROUGH: Patrina M. Clark *PM*  
Staff Director

FROM: Lynn M. Fraser, Acting Director *LMF*  
Alternative Dispute Resolution Office

SUBJECT: ADR 334 Bruderly for Congress and David Bruderly, Treasurer,  
Recommendation to Approve Settlement Agreement

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to **ADR 334 (MUR 5715)**. This case was opened on June 7, 2006, and was assigned to the ADR Office on September 13, 2006.

**SUMMARY:** Complainant, George C. Shuman, alleges that Bruderly for Congress and David Bruderly, Treasurer, ("Respondents" or the "Committee") filed erroneous 2004 30 Day Post-General and 2004 Year End Reports. The complaint details various errors, omissions and discrepancies the Complainant believes the reports reflect, including two disbursements on November 6, 2004, to the candidate, for \$3,469.33, and \$4,191.47, and a third disbursement on November 23, 2004 in the amount of \$4,949.68, again to the candidate, with no itemization or details other than "expense reimbursement."

Respondents contend that they have worked with RAD to correct any and all deficiencies in their reports. Respondents further contend that the errors have been for a variety of reasons, but that they updated and added to their software to assist them in filing complete and accurate reports. In addition, the Respondents assert that there are expense vouchers on file for all expenses reimbursed to the candidate, and that they misunderstood the requirements of the FECA, and did not believe they were required to itemize these expenses.

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**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Bruderly for Congress and David Bruderly, Treasurer.
2. Approve the appropriate letters.
3. Close the file on this matter.

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