



Federal Election Commission
Washington, DC 20463

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2006 SEP -8 A 11: 46

MEMORANDUM

September 7, 2006

SENSITIVE

TO: The Commission

THROUGH: Patrina M. Clark
Staff Director *MLC*

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

SUBJECT: ADR 339 Friends of John Conyers and M. Mickey Williams, Treasurer,
Recommendation to Assign

On June 14, 2006, the ADR Office received AR 06-02 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. The ADR Analysis 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, this case description will be provided to Respondents, as part of ADR Office's notification package sent to Respondents.

Respondents:
Friends of John Conyers
Mickey Williams, Treasurer

Respondents' Rep.:
M. Mickey Williams

Complainant: Audit Division

Committee Name: Friends of John Conyers

OGC Case Open Date: 6/5/06

Committee Type: Authorized

Date Forwarded to ADRO: 6/14/06

District #/or State: MI, 14th C.D.

[Redacted]

Election - Won/Lost: Won

[Redacted]

Election Cycle: 2004

Summary of Complaint: The Audit Division referred Friends of John Conyers and M. Mickey Williams, Treasurer, ("Respondents" or the "Committee") for failing to sufficiently disclose all receipts, for failing to timely deposit receipts, for failing to properly disburse funds, and for

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failing to maintain an accurate record of the disbursements. Specifically, the Audit staff determined that Respondents did not adequately disclose information for fifteen percent (15%) of itemized contributions from individuals, and approximately twenty-two percent (22%) of contributions from PACs, totaling \$19,250. The audit also found that the Committee failed to deposit, in a timely manner, fifty-five (55) checks from individuals totaling \$35,500, or approximately twenty-three percent (23%) of the total dollar value of individual contributions. In addition, the Audit staff determined that Respondents made sixty-nine (69) cash withdrawals from one of its bank accounts, totaling \$20,506, and failed to maintain adequate records for \$19,586 of those cash withdrawals.

Respondents' Reply: Respondents did not dispute omissions in some of their reports, but contend that they responded affirmatively to the Audit Division's recommendations. Respondents state they complied with the recommendations to change procedures to ensure future compliance, and filed the necessary amended reports.

RECOMMENDATION:

- 1. Assign ADR 339/AR 06-02 to the ADR Office.**

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