



Federal Election Commission
Washington, DC 20463

SENSITIVE

MEMORANDUM

February 22, 2007

TO: The Commission

THROUGH: Patrina M. Clark
Staff Director *me*

FROM: Margarita Maisonet
Chief Compliance Officer *mm*

Deborah Kant *DK*
Director, ADR Office

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

SUBJECT: ADR 365 and ADR 371 Mejias for Congress and Michael Norman, Treasurer,
Recommendation to Assign and Consolidate

On November 9, 2006, the ADR Office received MUR 5801, and on December 28, 2006, the ADR Office received MUR 5807, to review and determine if they are appropriate for ADR processing. Based on that review, we determined that the cases are appropriate for ADR, and recommend that these two matters be consolidated and assigned to the ADR Office. The ADR Office Recommendation 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 Office of General Counsel reviewed the ADR Recommendation, and concurs in the description of the cases.

ADR Case:
1. ADR 365
2. ADR 371

Source No.
1. MUR 5801
2. MUR 5807

Respondents:
Mejias for Congress
Michael Norman, Treasurer
David Mejias

Respondents' Rep.:
Michael Norman

28190273739

Complainant:
William Thomas
Eugene A. Turner

Committee Name:
Mejias for Congress

Date Complaints Filed:
1. 8/28/06
2. 9/14/06

Committee Type:
Authorized

Date Forwarded to ADRO:
1. 11/9/06
2. 12/28/06

District #/or State:
NY 3rd C.D.

Election - Won/Lost:
General - Lost

Election Cycle:
2006

Summary of Case: In ADR 365 (MUR 5801) the Complainant alleges that, based on disclosures in the 2006 July Quarterly Report, Mejias for Congress, Michael Norman, Treasurer, and David Mejias ("Respondents" or the "Committee"): (1) accepted contributions from what could be corporate entities; (2) failed to itemize and disclose occupation and employer on eighty-five percent (85%) of the contributions; (3) failed to attribute partnership contributions to the partners; and (4) failed to verify if limited liability company (LLC) contributions were from companies who elected to be treated as a partnership by the IRS, or did not designate if it wished to be treated as a corporation or a partnership. The Complainant further alleged that if the LLCs' contributions were valid as partnership contributions, Respondents failed to attribute the contribution between the partners. The complainant noted that these errors may indicate that the contributions violate federal law as prohibited corporate contributions or excessive contributions.

RECOMMENDATION:

- 1. Assign ADR 365/MUR 5801 and ADR 371/MUR 5807 to the ADR Office.**

28190273748