



THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

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MEMORANDUM

**SENSITIVE**

June 15, 2007

TO: The Commission

THROUGH: Patrina M. Clark  
Staff Director *PK*

FROM: John D. Gibson  
Acting Chief Compliance Officer *JDG*

Deborah Ruth Kant  
Director, ADR Office *DK*

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

SUBJECT: ADR 382 Friends of Yvonne Rayford Brown and Paul Breazeale, Treasurer  
Recommendation to Dismiss

On March 2, 2007, the ADR Office received MUR 5880 from the Office of General Counsel ("OGC") to review and determine its appropriateness for ADR processing. Based on that review, we recommend that it be closed. Following the procedures approved by the Commission on March 3, 2003, this matter will be closed by the ADR Office if the Commission approves the Recommendation in this Memorandum. OGC concurs in the description of this matter, and that it not be returned to OGC for further action.

**ADR Case:** ADR 382

**Source No.** MUR 5880

**Respondents:**

Friends of Yvonne Rayford Brown  
Paul V. Breazeale, Treasurer

**Respondents' Rep.:**

Paul V. Breazeale

**Complainant:**

Rep. Bennie G. Thompson

**Committee Name:**

Friends of Yvonne Rayford Brown

**Date Complaint Filed:** 11/7/06

**Committee Type:** Authorized

**Date Forwarded to ADRO:** 3/02/07

**District #/or State:** MS 2<sup>nd</sup> C.D.

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**Election – Won/Lost: Lost General**

**Election Cycle: 2006**

**Summary and Analysis of Case:** The FECA prohibits corporations from making, and political committees from accepting, contributions in connection with an election. The Complainant alleges that Friends of Yvonne Rayford Brown and Paul V Breazeale, Treasurer (“Respondents” or the “Committee”) accepted a \$1,000 contribution from Reliable Appraisal Services, Inc. In addition, the complaint alleges that Respondents indicated on Schedule C of the 2006 October Quarterly Report that a loan from the candidate was secured, but failed to disclose the collateral.

Respondents contend that the Committee did not realize that it had accepted a corporate contribution. Respondents stated that the contribution will be disgorged to the US Treasury, and verification of that will be provided to the Commission. In response to the second allegation raised in the complaint, Respondents assert that the \$10,000 loan was from the former candidate, and was not secured. The check in the box indicating that the loan was secured on Schedule C, for the \$10,000 loan dated September 28, 2006, was an error.

**RECOMMENDATION:**

1. Dismiss ADR 382 (MUR 5880), and close the file.
2. Approve the appropriate letters.

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