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THE FEDERAL ELECTION COMMISSION  
Washington, DC 20463

2007 AUG 14 P 12:29

**SENSITIVE**

**MEMORANDUM**

August 14, 2007

TO: The Commission  
*JFC*

THROUGH: Patrina M. Clark  
Staff Director  
*pmc*

FROM: John D. Gibson  
Chief Compliance Officer  
*JG*

Deborah Ruth Kanto  
Director, ADR Office  
*DRK*

SUBJECT: ADR 385 It's My Party<sup>1</sup> and Ronald Gravino, Treasurer, Recommendation  
to Approve Settlement Agreement

**RESOLUTION TERMS:** New compliance procedures tailored for the Committee; statement of compliance with internal controls as suggested by Commission Policy Statement, 4/5/07; submission of these documents to the Commission; and payment of a civil penalty of \$2500 (amount in dispute \$150,511.54)

Attached for your review is a signed negotiated ADR Settlement Agreement pertaining to ADR 385 (RR 07L-04). This case was received by the ADR Office on March 28 2007, and was assigned to the ADR Office on April 17, 2007.

**SUMMARY:** Treasurers of political committees are required to report all financial activity, including all receipts pursuant to the FECA. In this case, the Respondents filed an amended 2006 July Quarterly Report on October 10, 2006, disclosing additional receipts totaling \$150,511.54. This amount reflects a 195.6% increase from the receipts reported in

<sup>1</sup> On February 26, 2007, the Committee changed its name to "The Republican Leadership Council Federal PAC." For the sake of convenience, this memorandum refers to the Committee as "It's My Party."

the original report. The Respondents contend that this error was primarily because the Committee had converted to a new reporting software and the Committee's computers had also crashed, causing a loss of data during this reporting period.

**RECOMMENDATIONS:**

1. Approve the attached settlement agreement of Its My Party, and Ronald Gravino, Treasurer
2. Approve the appropriate letters
3. Close the file on this matter.